

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TRICIA DANIELS

JURY TRIAL  
DEMANDED  
COMPLAINT

NAME OF PLAINTIFF(S)

LIONSGATE  
ENTERTAINMENT  
CORP.

NAME OF DEFENDANT(S)

This action is brought for discrimination in employment pursuant to (check only those that apply):

☒

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

**NOTE:** *In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

☐

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102-166).

**NOTE:** *In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

☐

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117 (amended by the ADA Amendments Act of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 102-166).

**NOTE:** *In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

Jurisdiction is specifically conferred upon this United States District Court by the  
aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be  
appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of  
1991, Pub. L. No. 102-166, and any related claims under New York law.

1. Plaintiff resides at:

67-29 Bell Blvd., Lower Apartment  
Street Address  
Oakland Gardens, NY, 11364, 310 614-3408  
County State Zip Code Telephone Number

2. Defendant(s) resides at, or its business is located at:

2700 Colorado Avenue, Suite #200  
Street Address  
Santa Monica, CA, 90404  
County City State Zip Code

3. The address at which I sought employment or was employed by the defendant(s) is:

1800 N. Highland Avenue  
Street Address  
Los Angeles, CA, 90028  
County City State Zip Code

4. The discriminatory conduct of which I complain in this action includes  
(check only those that apply).

☐

Failure to hire.

☒

Termination of my employment.

☐

Failure to promote.

☐

Failure to accommodate my disability.

☒

Unequal terms and conditions of my employment.

☒

Retaliation - Continuing Violation Doctrine  
A) Assault and Battery including

☒

Other acts (specify): Sexual Assault  
B) 46,368 unpaid hours

**NOTE:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

5. It is my best recollection that the alleged discriminatory acts occurred on:

#1) 10/15/10 #2) 11/30/10 #3) 1/21/11 #4) week of 2/14/11  
Date(s) #5) 5/5/2011 #6) 2/5/14 #7) 9/8-9/2015

6. I believe that the defendant(s) (check one)

☒

is still committing these acts against me.

☐

is not still committing these acts against me.

7. Defendant(s) discriminated against me based on my: Protected Activity  
(check only those that apply and state the basis for discrimination, for example,  
what is your religion, if religious discrimination is alleged)

☒ Retaliation - Continuing Violation Doctrine Claim

☐ race ☐ color

☐ gender/sex ☐ religion

☐ national origin

☐ disability

☐ age. If age is checked, answer the following:

I was born in \_\_\_\_\_. At the time(s) defendant(s) discriminated against me,  
Year

I was ☐ more ☐ less than 40 years old. (check one).

**NOTE:** *Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.*

8. The facts of my case are as follows:

SEE: ADDITIONAL SHEETS

*(Attach additional sheets as necessary)*

**NOTE:** *As additional support for your claim, you may attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights, or the New York City Commission on Human Rights.*

9. It is my best recollection that I filed a charge with the New York State Division of Human Rights or the New York City Commission on Human Rights regarding defendant's alleged discriminatory conduct on: N/A  
Date

10. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: 9/18/15  
Date

Only litigants alleging age discrimination must answer Question #11.

11. Since filing my charge of age discrimination with the Equal Employment Opportunity

Commission regarding defendant's alleged discriminatory conduct (*check one*):

\_\_\_\_\_ 60 days or more have elapsed.

\_\_\_\_\_ less than 60 days have elapsed.

12. The Equal Employment Opportunity Commission (*check one*):

\_\_\_\_\_ has not issued a Right to Sue letter.

✓ \_\_\_\_\_ has issued a Right to Sue letter, which I  
received on 11/20/15  
Date

**NOTE:** Attach a copy of the Right to Sue Letter from the Equal Employment Opportunity Commission to this complaint.

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, pre-judgment interest, costs, and attorney's fees, plus:

A) Damages for back pay and benefits lost and for future pay and benefits lost

  
PLAINTIFF'S SIGNATURE

Dated: ~~12/8/15~~ 12/9/15

B) Damages for loss of enjoyment of life, pain and suffering, mental anguish, emotional distress, and humiliation

67-29 Bell Blvd, Lower Apartment  
Address  
Oakland Gardens, NY 11364

C) Punitive damages

310-614-3408  
Phone Number

D) Quantum meruit for the most recent consecutive 46,368 hours of my life

E) Compensation for any tax penalty associated with a recovery

F) Whatever further and additional relief the Court shall deem just and equitable.

Complaint Under Title VII, ADA or ADEA EDNY, rev. 4/23/13



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**New York District Office**

33 Whitehall Street, 5<sup>th</sup> Floor  
New York, NY 10004-2112  
For General Information: (800) 669-4000  
TTY: (800)-669-6820  
District Office: (212) 336-3620  
General FAX: (212) 336-3625

Ms. Tricia Daniels  
67-29 Bell Boulevard  
Lower Apartment  
Oakland Gardens, NY 11364

Re: EEOC Charge No. 520-2016-00108  
Tricia Daniels v. LIONSGATE ENTERTAINMENT CORPORATION

Dear Ms. Daniels,

The Equal Employment Opportunity Commission (hereinafter referred to as the "Commission") has reviewed the above-referenced charge according to our charge prioritization procedures. These procedures, which are based on a reallocation of the Commission's staff resources, apply to all open charges in our inventory and call for us to focus our limited resources on those cases that are most likely to result in findings of violations of the laws we enforce.

In accordance with these procedures, we have examined your charge based upon the information and evidence you submitted. You allege you were discriminated against because of your age, religion, and in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended and The Age Discrimination in Employment Act of 1967 as amended.

Based upon the Commission's analysis, it is unable to conclude that the information establishes a violation of Federal law on the part of Respondent. This does not certify that Respondent is in compliance with the statutes. No finding is made as to any other issue that might be construed as having been raised by this charge.

The Commission's processing of this charge has been concluded. Included with this letter is your Notice of Dismissal and Right to Sue. Following this dismissal, you may only pursue this matter by filing suit against the Respondent named in the charge within 90 days of receipt of said notice. Otherwise, your right to sue will be lost.

Please contact Investigator Gustavo A. Blanco at 212-336-3640 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin J. Berry", is written over a horizontal line. To the right of the signature, the word "for" is printed.

Kevin J. Berry  
District Director

11/18/2015  
Date

#6



EEOC Form 161 (11/09)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Tricia Daniels**  
**67-29 Bell Boulevard**  
**Lower Apartment**  
**Oakland Gardens, NY 11364**

From: **New York District Office**  
**33 Whitehall Street**  
**5th Floor**  
**New York, NY 10004**

☐

On behalf of person(s) aggrieved whose identity is  
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

**520-2016-00108**

**Gustavo A. Blanco,**  
**Investigator**

**(212) 336-3640**

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☒

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☐

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

*Kevin J. Berry*  
**Kevin J. Berry,**  
**District Director**

11/18/2015

(Date Mailed)

Enclosures(s)

cc:

**Ross Pollack**  
**Chief Human Resources Officer**  
**LIONSGATE ENTERTAINMENT CORPORATION**  
**2700 Colorado Ave. Floor 2**  
**Santa Monica, CA 90404**

#7

Enclosure with EEOC  
Form 161 (11/09)

**INFORMATION RELATED TO FILING SUIT  
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.  
If you also plan to sue claiming violations of State law, please be aware that time limits and other  
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),  
the Genetic Information Nondiscrimination Act (GINA), or the Age  
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

**PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):**

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

**ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:**

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

**ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:**

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

**IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.**

# 8



**TABLE OF CONTENTS: THE FACTS OF MY CASE ARE:**

<u>Item:</u>	<u>Page:</u>
Section One: My Statutes of Limitations.....	10
Section Two: Introduction.....	11
Section Three: Sexual Harassment Training Employees of TV Guide Network Were Given From 2005 through 2008.....	12
Section Four: Sexual Harassment Instructions that Lionsgate Gave Employees of TV Guide Network on February 6, 2009.....	14
Section Five: Michael Nalepa, Satellite Molester, I Seek Rescue.....	16
Section Six: I Seek Recovery.....	16
Section Seven: Chart: Pattern and Practice of Retaliation, Discrimination and Adverse Employment Actions Taken Against Me By Officers of Lionsgate Who Are In Charge of Employee Matters.....	16

---

#9

## TABLE OF CONTENTS: (CONTINUED)

<u>Item:</u>	<u>Page:</u>
Section Eight: Log of Burnings and Satellite Transponder Assault And Battery that I Was A Victim Of From August 15, 2015 To October 10, 2015.....	42
Section Nine: The Facts of My Case Are As Follows.....	64
Section Ten: Privacy Rights Invasion.....	136
Section Eleven: Negligent Intentional Inflictions of Emotional Distress That I Was Made To Suffer Through.....	139
Section Twelve: List of U.S. Satellite Experts and Consultants.....	157

### EXHIBITS:

Exhibit 1	David Mandell's Cease & Desist Email.....	159
Exhibit 2	My EEOC Complaint/Charge, filed September 18, 2015 with some (not all) of the exhibits that I included.....	162

---

#9A

---

Date: December 8, 2015

I, Tricia Daniels, hereby declare, under the penalty of perjury, that the foregoing is true and correct, to the best of knowledge, information, and belief:

I, Tricia Daniels am a TV Show Talent Booker, I have no legal training; no legal guidance. I'm just a real person writing, trying simply as best as I can, in my own words to state facts that I have experienced and continue to experience firsthand.

In submitting this complaint, I believe that my former co-workers at TV Guide Network especially Mr. Michael Nalepa's legal rights will be 100% protected in every aspect by the United States District Court for the Eastern District of New York.

### **SECTION ONE: MY STATUTES OF LIMITATIONS:**

At the time of this writing, I feel that my Statutes of Limitations are 100 per cent intact and actually have not even begun ticking yet.

I am the victim of a continuous, still continuing 'torts filled broadcasting event crime' complete with on-going retaliation, discrimination, sexual harassment, sexual assault and battery, and religion harassment and possible age discrimination, that started over 1932 days ago.

Throughout the most recent, consecutive 1932 days of my life, for 24/7, 365 days a year, even when I try to have uninterrupted sleep, I have remained imprisoned by a groundbreaking, headline-making broadcasting technology imprisonment crime.

The most recent 1932 days of my life can also be converted into one of these units:

- The most recent, consecutive 46,368 hours of my life
- The most recent consecutive 276 weeks of my life

#10

- The most recent, consecutive 166,924,800 seconds of my life
- The most recent, consecutive 2,782,080 minutes of my life
- The most recent, consecutive 5 years, 3 months and 14 days including today's date of December 8, 2015.

## **SECTION TWO: INTRODUCTION**

My tortfeasors have been two-fold. First, a group of former co-workers whose workplace duties were to create, produce, talent book, write and transmit TV programming. Their use of broadcasting operations machinery and associated computer log-in pathways are core Lionsgate company technology assets that these employees use in their daily scope of employment to do their work.

Second, my tortfeasors are also the actual broadcasting operations machinery and United States government issued FCC License that allows Lionsgate to daily broadcast TV Guide Network (now POP TV) to customers and viewers with.

Machinery, such as: satellite transponders, earth stations, transmitters and closed-captioning machines are central to Lionsgate's broadcasting business for without their use, Lionsgate would not be able to fulfill its broadcasting business obligations, broadcast the shows produced by employees, or make money from TV Guide Network (now Pop TV).

In regard to the FCC License, the Federal Communications Commission (FCC) is an independent agency of the United States government created by congressional statute (see: see 47 U.S.C. § 151 and 47 U.S.C. § 154) to regulate interstate communications by radio, television, wire, satellite and cable in all 50 states, the District of Columbia and U.S. territories. The FCC works towards six goals in the areas of broadband, competition, the spectrum, the media, public safety and homeland security.

I allege that a new public safety hazard has been created by the operation of TV Guide Network's (now Pop TV's) core business machinery that Lionsgate and the Court will learn so much about from my firsthand experiences. Together, Lionsgate and the Court will learn even more about new workplace safety hazards and public safety hazards that now exist

# 11



within the broadcasting industry. These new areas that will be of concern to broadcasting business owners have been created by new advances in both satellite telecommunications and computer technology.

When Lionsgate and the Court have seen exactly what has been created at TV Guide Network (now POP TV), Lionsgate will be able to take leadership amongst all of the world's broadcasters in the new area of broadcasting owner responsibility that has been born that I am the Poster Child Victim for. I call this area "Broadcasting Safety & Satellite Transponder Beam Routing Safety."

Michael Nalepa, my former TV Guide Network co-worker is my #1 Witness, he's one of my top co-worker tortfeasors and he's also Lionsgate's ticket to taking industry leadership to create new protections that will restore public safety to United States government FCC licensed airwaves and electromagnetic spectrum.

### **SECTION THREE: SEXUAL HARASSMENT TRAINING EMPLOYEES OF TV GUIDE NETWORK WERE GIVEN FROM 2005 THROUGH 2008**

Former co-worker Michael Nalepa (Title: Talent Department Assistant) who was either 24 or 25 years old when he was hired in October 2006 allegedly was never given sexual harassment training throughout his entire stay of employment. Michael worked at TV Guide Network from October 2006 into January 2011.

Likewise, Michael's direct supervisor, named Lisa Germani (Title: Director, Talent Department) allegedly never attended the required supervisory sexual harassment training session that took place in 2005.

Therefore one can make the argument that Lisa Germani should never have been allowed to manage any staff, starting in February 2006 and onwards, including supervising both Michael Nalepa throughout his entire employment, and including supervising me, when Nancy Coleman (E.V.P. of Human Resources, Lionsgate) made Lisa Germani my sole supervisor starting in mid-February 2011.

# 12

The California State Department of Fair Employment and Housing states: "Employers with 50 or more employees must provide at least two hours of classroom or other effective interactive training and education regarding sexual harassment to all supervisory employees who are employed as of July 1, 2005, and to all new supervisory employees within six months of assuming a supervisory position. Thereafter, covered employers must provide sexual harassment training and education to each supervisory employee once every two years."

Allegedly in 2010 and into 2011, Lisa Germani knew that she did not have the California State required sexual harassment Training that a supervisory employee who managed any staff at a company like ours was required to have.

I personally remember that day (circa 2005) when our then Talent Department Assistant, named Chad Sandhas, (who preceded Michael Nalepa in this position) revealed that instead of attending that day's two-hour sexual harassment supervisor training session which Rupert Murdoch's News Corp. who had managing control of TV Guide Network at the time mandated that Gemstar-TV Guide Network supervisors were to attend, that Lisa instead left the office early for off-time. I still remember Chad Sandhas' little laugh and the way he shook his head from side to side when he told me this information.

Daily, I ask myself if some of the damages that happened to me from August 13, 2010 to December 8, 2015, were caused specifically due to the negligence of Lionsgate's Human Resources Department (and the negligence of Macrovision, now ROVI in 2007 and 2008) in giving the California State Law required sexual harassment training to all supervisory employees of TV Guide Network?

I also ask myself, how is it possible that when Lionsgate purchased TV Guide Network in early 2009, that Lionsgate had no idea that TV Guide Network supervisors had no interactive sexual harassment training and education since circa 2005?

Nancy Coleman (title: EVP, Human Resources, Lionsgate) was a human resources leader within the Hollywood, California motion picture studio system for many years. Yes, it costs some money to provide proper California State law mandated sexual harassment training to all supervisory

employees, of the departments, of a company the size of Lionsgate, but for some reason, intentional, or just in all-out negligence, Lisa Germani and other “newly-minted” supervisory employees of Lionsgate’s TV Guide Network in 2009 and in 2010 were skipped over for supervisory sexual harassment training by Lionsgate’s Human Resources Department.

**SECTION FOUR: SEXUAL HARASSMENT INSTRUCTIONS THAT LIONSGATE GAVE EMPLOYEES OF TV GUIDE NETWORK ON FEBRUARY 6, 2009**

On February 6, 2009, a sexual harassment pamphlet was given to every employee of TV Guide Network who were in attendance during our 1:30pm New Hire-Benefits Meeting that Randy Young, Benefits Manager of Lionsgate’s Human Resources Department hosted which was attended by me and more than 60 fellow employees of our Hollywood, California office.

The pamphlet titled “Sexual Harassment Hurts Everyone” detailed how “sexual harassment” was prohibited by this company. The pamphlet did not have Lionsgate’s logo on it, instead, the two page document folded down into a brochure looked like Lionsgate purchased a bulk amount of these from a vendor. Still, it was an official document that Lionsgate was presenting to all employees of TV Guide Network who attended the meeting and it outlined Lionsgate’s sexual harassment policies, detailed State and Federal Law and gave reporting directions to employees as well as instructions. (I still have my “Welcome to Lionsgate” folder and I have my copy of this pamphlet.)

The instructions in the pamphlet told me-“When possible, confront the harasser and ask him/her to stop. The harasser may not realize the advances or behavior are offensive. When it is appropriate and sensible, you may want to tell the harasser the behavior or advances are unwelcome and must stop. Sometimes a simple confrontation will end the situation.”

During his meeting, Randy Young also stated to all of us that Lionsgate is a company where sexual harassment is not allowed.

#14



That day, February 6, 2009, just prior to Randy's hosted meeting, I along with every other employee of TV Guide Network's Hollywood, California office received by email, a pdf attachment, which was Lionsgate's Employee Manual that Lionsgate wanted all of us to have and read.

It was clearly stated on several different pages of Lionsgate's Employee Manual that sexual harassment is an example of conducts that do not meet the company's high standards. Other areas of bad conduct that were listed included "actual or threatened physical violence and/or abusive or foul language towards others."

Lionsgate's Employee Manual (on page 43) also had a Policy Statement On All Forms of Harassment which I have copied and pasted here:

Lions Gate is opposed to and prohibits any employee (or client or customer) from harassing another employee on the basis of race, color, gender, sexual orientation, religion, age, pregnancy, national origin, disability, or medical condition, or marital status, all as defined by applicable law. Prohibited harassment includes, but is not limited to, slurs or other types of behavior which substantially interfere with a reasonable employee's work performance by creating an intimidating, hostile or offensive work environment. Any employee or applicant who feels that he or she has been harassed due to the employee's race, color, gender, sexual orientation, religion, age, pregnancy, national origin, disability or medical condition, or marital status should report such incidents immediately, without fear of reprisal, to: any level of management; the Human Resources or Law Departments; or the Compliance Officer (directly or via the anonymous hotline). Lions Gate considers any form of prohibited harassment to be a serious matter. Violators of this policy are subject to disciplinary action up to and including termination from employment. No employee or supervisor shall in any way retaliate against another employee for making in good faith a complaint of harassment or for participating in an investigation by the Company regarding harassment.

# 15



**SECTION FIVE: MICHAEL NALEPA, SATELLITE MOLESTER, I SEEK RESCUE:**

There is so much that I can say about Michael Nalepa, but since I've already stated so much about Michael Nalepa in my documents from the last two years, many of which are contained within this complaint, I will instead take this space to tell Lionsgate and the Court that I personally feel that Michael Nalepa should be made into an informant. He's my #1 Witness.

**SECTION SIX: I SEEK RECOVERY:**

I want to be compensated and seek recovery for the damages caused to me as a Lionsgate employee and as a post-employee of Liongate. Damages that I have endured for the most recent, consecutive 1932 days of my life! Damages that I allege have been caused by Officers of Lionsgate who breached their duty to me, an employee of the company. I want to be made whole again.

**The facts of my case are as follows:**

**SECTION SEVEN: CHART: THE PATTERN AND PRACTICE OF RETALIATION, DISCRIMINATION AND ADVERSE EMPLOYMENT ACTIONS TAKEN AGAINST ME BY OFFICERS OF LIONSGATE WHO ARE IN CHARGE OF EMPLOYEE MATTERS.**

**Alternate Title: TITLE VII VIOLATIONS OF THE CIVIL RIGHTS ACT RETALIATION CHART**

**I wish the Court to apply the Continuing Violation Doctrine to the On-Going Retaliation Acts that comprise the chart below.**

I allege that Defendant Lionsgate and some of its officers, in their daily scope(s) of business, who were in charge of representing Lionsgate to employees, and making employee decisions for the company owed to me,

#16

Tricia Daniels, a duty of care as my employer, not to intentionally and negligently and consistently retaliate and discriminate against me for making a series of "protected activity" reports of torts and wrongdoing taking place at the company, specifically my co-workers misuse of TV Guide Network's FCC License and intentional negligent misuse of TV Guide Network's owned and leased broadcasting operations machinery including satellite transponder, to commit heinous torts, that I was being injured by.

As an employee and subsequently as a post-employee of Lionsgate, I was and still am experiencing these same torts first hand and I have suffered incredible economic damages and out-of-pocket costs, due to an on-going series of what I allege to be: intentionally negligent retaliation and discrimination acts that Officers of Lionsgate have made me suffer through, that I am due recovery for. These officers did not treat me equal and fairly to other employees of the company. U.S. employment laws allow me to seek recovery for my damages.

I assert that I am due Quantum meruit recovery for the most recent consecutive 1932 days of my life, 1664 days of which, have been spent as a post-employee of Lionsgate.

I assert that I am also due Quantum meruit recovery, compensatory and punitive damages and ALL DAMAGES POSSIBLE including back-pay, reinstatement, and whatever the Court can issue judgement on that will make me whole again.

Below is a chart of some of the successive intentional retaliation acts I allege were committed against me by Officers of Lionsgate.

Please note that I properly documented and complained about this series of on-going retaliation and discriminatory acts within my EEOC complaint/charge made on September 18, 2015.

#17

---

# TRICIA DANIELS

## Retaliation Act #1:

**Date of Protected Activity: October 15, 2010**

### **What Tricia Daniels Did:**

Before Lunch, I, Tricia Daniels, (Title: Senior Story Editor) in "protected activity" properly and reasonably confronted and stood up to co-worker Lisa Germani (Director, Talent Department) and told Lisa to stop her campaign against me.

I had a reasonable and good faith belief as well as my co-workers admissions that Lisa Germani was the kingpin behind a series of continuing co-worker torts played out on me including religion discrimination, sexual harassment, sexual assault and battery, "interactive human games" and a man-made eyesight disability.

Yes man-made! According to my co-workers, Lisa Germani and their usage of TV Guide Network's powerful C-Band broadcast satellite transponder on me to harass me, to assault me, and to monitor me had given me a man-made, co-worker-created harassment disability. There was so much satellite monitoring on me that my eyes and skin became incompatible to most types of lighting including office fluorescents, lamp lighting, car headlights, street lamp lighting, sunlight that shined through windows, store lighting and elevator lighting.

In summer 2010, I asked Lionsgate's Human Resources Department for accommodation, in the way of helping me to find a darker area of TV Guide Network's offices that I could work from. On October 15, 2010, Nancy Coleman and Rochelle Kasten of Lionsgate's Human Resources Department were still working on this for me.

#18

Summer 2010 was not the first time when this co-worker-made eyesight problem occurred due to Lisa Germani's "live" monitoring of me by broadcast satellite. During Fall 2009, with help from Rochelle Kasten (Human Resources, Lionsgate) and Greg Hughes (Director, Operations, TV Guide Network), I moved from my 7<sup>th</sup> floor cubicle downstairs to a darker area cubicle that existed on TV Guide Network's 6<sup>th</sup> floor.

But during summer 2010, the lighting problem that had manifested itself in 2009, suddenly became worse and even more unbearable to my eyes and skin. It seemed that the wattages had somehow increased.

So, before Lunch on October 15, 2010, I, in "protected activity" properly and reasonably confronted and stood up to co-worker Lisa Germani (Director, Talent Department) within the confines of Lisa's 6<sup>th</sup> floor office and told Lisa to stop the campaign on me.

My co-workers such as Michael Nalepa, Anne Alderete, Amy Sweet, Laura Slobin and others maybe themselves had been scared to confront Lisa, but it was October 15, 2010 and for just over two months I had endured extreme levels of co-worker conduct that is strictly prohibited in Lionsgate's Employee Manual as well as by law and I just needed the activity to STOP.

When I confronted Lisa, at the end of my conversation I told her that I was going to get some lunch and that I'd be back after my lunch break. During my lunch break, Lisa reached out to me by email on my company blackberry to "check in" on me and I replied back.

I had hoped that when I'd return to TV Guide Network's office after my lunch period that the co-worker harassment campaign would be gone, and just be a thing of the past and that all of us employees of TV Guide Network including Lisa Germani would move on from it as we had so much exciting work to do together for Lionsgate, the owner of TV Guide network.

After I returned from Lunch on October 15, 2010 Lisa Germani at one point told me that Rochelle Kasten of Human Resources wants me to take down the shielding that's around my cubicle."

The background on my shielding is that since 2009, I problem-solved and



found that I could use store-purchased foil auto-shielding to block-out extra fluorescent office lighting from my cubicle. I also had to wear sunglasses in our office.

Sadly, anytime between 2009 and October 15, 2010, if Lisa Germani and her top helper, Michael Nalepa (my #1 tortfeasor who is also my #1 witness) would have been compassionate about the suffering and eyesight distress that they were putting me through by keeping high wattage beams over my body that originated from TV Guide Network's broadcast satellite transponder, then my co-worker made, eyesight disability would have probably be cured the second that Lisa and Michael would have shut down their broadcasting technology crime.

Shortly after Lisa made her remark about Rochelle Kasten from Lionsgate Human Resources wanting me to take down my shielding, I had an in-person conversation with Rochelle. Since mid-summer 2010, Rochelle was working with her boss Nancy Coleman (EVP of Human Resources for Lionsgate) to find a new darker area of the office for me to work in. Rochelle did not order me to remove any of my shielding and she made a bizarre remark that Lisa Germani told her that I had complained to Lisa about uncomfortable heat that was coming out of the back wall of my cubicle. I said to myself "Huh?" and I told Rochelle that I never made any such remark like that to Lisa.

Another thing that happened post-lunch on October 15, 2010 is that Lisa Germani committed sexual harassment in our office when she loudly said to Michael Nalepa- our openly gay talent department assistant, quote- "Lick My Dick."

During the afternoon of October 15, 2010, Lisa Germani maliciously transferred her own sexual harassment situation to me and she made up a phony and defaming allegation that I had just committed sexual harassment in our office. In an act of retaliation towards me for standing up to her before lunch, that afternoon, Lisa reported me to Lionsgate Human Resources to try to immediately end my employment.

# LIONSGATE

## **Retaliation Act #1:**

**Date of Retaliation: October 15, 2010**

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

At 5:15pm, Nancy Coleman (EVP of Human Resources, Lionsgate) that afternoon discriminated against me and took an adverse employment action against me but did not take any adverse employment action against Lisa Germani.

That day Nancy Coleman clearly favored Lisa Germani, and believed Lisa's malicious lie and Nancy struck out at me, treating me unequal to the way she was treating Lisa.

The adverse employment action that Nancy Coleman took against me on this day was when Nancy changed the venue of my employment. I would no longer be an office worker- I'd have to work from home and Nancy ordered me to get a "consultation"- although Nancy didn't further explain what sort of "consultation" she wanted me to get. Even worse, Nancy refused to investigate.

I prayed that one of my co-workers would speak-up to Nancy Coleman on my behalf to tell Nancy that she's wrongly punishing me but none of them did.

I allege that my co-workers were scared of opening their mouths to make good-faith, protected activity reports about the illegal activity and wrongdoings that were taking place at Lionsgate's TV Guide Network with our satellite transponder and broadcasting operations machinery. For if they did, then Nancy Coleman on behalf of Lionsgate could retaliate and discriminate against them too by instilling similar adverse employment actions on them. If Nancy could treat Tricia Daniels with

# 21

such discrimination then Nancy could discriminate and retaliate against my co-workers instead of thanking them with reward for coming forth to set the facts straight.

Sadly, I also allege that my co-workers including Michael Nalepa were afraid of standing up to Lisa Germani. For, if Lisa could make up such a malicious lie that Tricia Daniels committed sexual harassment in TV Guide Network's offices and get away with doing this to me, Lisa would be able to make up lies that would tamper with my co-workers' Lionsgate employments and benefits too.

## TRICIA DANIELS

### **Retaliation Act #2:**

**Date of Protected Activity: November 30, 2010**

### **What Tricia Daniels Did:**

Still a victim of outrageous, criminal activity from co-workers, even while fulfilling Nancy Coleman's adverse employment action, where Nancy kept me working from home and wouldn't return me to the office. I, in a new act of "protected activity" sent some emails to Nancy Coleman and to others in the company to report the outrageous activity still taking place against me by my co-workers who were using TV Guide Network's satellite transponder and broadcasting machinery to still broadcast 24 hours a day, seven days a week in shifts, to me.

I wanted my co-workers to end their broadcast. Lisa Germani was allowed to work in the office during this time while I telecommuted from home and for 6 weeks already, Nancy Coleman was discriminating against me and clearly favoring Lisa Germani.

#22

# LIONSGATE

## **Retaliation Act #2:**

**Date of Retaliation: November 30, 2010**

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

Nancy Coleman (E.V.P. of Human Resources, Lionsgate) retaliated and discriminated anew against me by instilling a new adverse employment action on me while Nancy again clearly favored and did not retaliate and discriminate against Lisa Germani.

Nancy Coleman on November 30, 2010 put me on a forced "Work Stoppage" and "Leave of Absence" from Lionsgate.

See Note #107 within this complaint for the details.



## TRICIA DANIELS

### **Retaliation Act #3:**

**Date of Protected Activity: November 30, 2010**

### **What Tricia Daniels Did:**

When I received Nancy Coleman's "work stoppage/leave of absence" email on November 30, 2010, it was outrageous to me that Nancy Coleman was again punishing me. Nancy's work stoppage order to me was about to hurt the talent booking activities of TV Guide Network, so in a new act of "protected activity," I went over Nancy Coleman's head and sent an email to Heather Somaini (Chief of Staff, Lionsgate) and I cc'd Jon Feltheimer (CEO of Lionsgate) to report criminal activities taking place at Lionsgate's TV Guide Network.

## LIONSGATE

### **Retaliation Act #3:**

**Date of Retaliation: November 30, 2010**

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

Just after I sent my email to Heather Somaini where I cc'd Jon Feltheimer, a new adverse employment action was taken against me when my company email was shut-off from me so that I couldn't have any contact with anyone from Lionsgate, so that I couldn't make more "protected activity" reports of wrongdoing taking place at the company,

#24

and so I couldn't even send out emails to the large amount of Publicists and Studio Marketing Executives who I dealt with to tell them that I am going to be 'out-of-pocket' for a few weeks where I could refer my important contacts to a co-worker at the network who they could deal with about current and future business in my absence.

The damages caused to Tricia Daniels as well as to TV Guide Network's upcoming programming slate by Nancy Coleman (E.V.P, Human Resources, Lionsgate) and by Lisa Germani (Director, Talent Department) were astounding. Nancy's negligent retaliation and discrimination act against me caused incredible career damage to me as it looked to all of my trusted contacts and to all of my co-workers that I just disappeared without notice and left my huge volume and body of important work purposely undone.

Throughout my entire career as a talent booker, spanning from circa 1981 to the present, I have always been a 'difference-maker' amongst talent bookers and throughout my career body of work, the trademarks of Tricia Daniels have always been my journalistic excellence, my passion for my craft, my reliability and creativity, my quick responsiveness to breaking news situations, my dependability as well as the dependability of my word and now my whole reputation and industry-standing was on-the-line because of a lie to Human Resources that co-worker Lisa Germani maliciously made up about me, combined with Nancy Coleman's negligent and discriminatory breach of duty to me. I was an employee of Lionsgate and Nancy Coleman, the top Human Resources Executive for Lionsgate clearly favored co-worker Lisa Germani while Nancy discriminated and retaliated against me.

To this day, I have no explanation as to why Nancy Coleman chose to favor Lisa Germani and discriminate against me, Perhaps it was due to the fact that Nancy and Lisa both have blonde colored hair and I, Tricia Daniels am a brunette? (I have dark brown hair).

Nancy Coleman's intentional and negligent breach of duty in issuing punishments to me also caused immense emotional distress to me because I had so many interviews and shoots booked with A-List celebrities for Lionsgate's TV Guide Network, and due to Nancy's work stoppage order to me, I couldn't finish my work.

But when computer access to my work email and to TV Guide Network's Programming Shoots Calendar were immediately terminated from me, either by Nancy Coleman or by Lisa Germani, or by Michael Nalepa who could have been ratified by Lisa, I was prevented from having any further communication with Lionsgate's Officers and my own co-workers where I'd be able to continue to report Nancy Coleman's unfair, unfounded discriminatory and retaliation punishments of me.

## TRICIA DANIELS

### Retaliation Act #4:

**Date of Protected Activity:** still on-going from November 30, 2010

**What Tricia Daniels Did:** Nothing...I was being newly punished!

## LIONSGATE

### Retaliation Act #4:

**Dates of Retaliation:** a) January 21, 2011 and  
b) The week of February 14, 2011

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

From November 30, 2010-onwards, Nancy Coleman kept me on the payroll, but kept me on "Work Stoppage/Leave of Absence" and in

# 26

December 2010, Nancy Coleman wouldn't budge, she ordered me to go for a "Fitness-For-Duty" exam.

Due to the holidays it was tough to get a "Fitness-For-Duty" appointment until January with the Doctor that Nancy chose for me to go to.

On Friday, January 21, 2011, I took a 3-hour "Fitness-For-Duty" exam and passed with flying colors. There was nothing wrong with me, there was no mental illness, no need for any follow-up appointments. No need to put me on any type of disability.

Nancy Coleman's "Fitness-For-Duty" Doctor cleared me to return to the office.

But for Nancy Coleman, Tricia Daniels being cleared to return to the office wasn't probably what Nancy wanted. So Nancy in a new retaliation act against me ordered me to return to her "Fitness-For-Duty" doctor so that he could give Nancy Coleman a second opinion.

On February 11, 2011, I paid a second visit to Nancy Coleman's "Fitness For Duty" Doctor and the Doctor cleared me a second time to return to the office. Additionally, The Doctor was visibly upset that Nancy had not returned me to the office immediately after my first meeting with him.

The entire "Fitness-For-Duty" exam chapter was discriminatory because Nancy Coleman did not punish Lisa Germani. Nancy did not put Lisa Germani on "Work Stoppage/Leave of Absence" and Nancy did not make Lisa Germani visit Lionsgate's "Fitness For Duty" Doctor the way that I was ordered to visit him. Nancy Coleman's retaliation against me by ordering me to get the first and then the second "Fitness For Duty" appointment is another situation where Nancy intentionally breached her duty as an officer of Lionsgate to me, by her all-out favoring of co-worker Lisa Germani over me for no justifiable business reason.

My "fitness-for-duty" chapter was humiliating and embarrassing because a group of my co-workers, the ones at the time who were broadcasting 24/7 daily to me through what I referred to as "the live feeds" knew about Nancy Coleman's wrongful retaliations against me.

I prayed that Rick Saloomey (Supervising Producer, Specials) or David

#27



Park (Freelance Producer) or Tom McMahon (Producer) or Laura Slobin (Writer) or Carla Hawkes (Producer) or Steve Sabellico (Director, Rights and Clearances), the broadcast voices at that time, would have spoken up to Nancy Coleman that she's wrongly punishing Tricia Daniels, but none of them did.

I allege that my co-workers were scared of opening their mouths to make their own good-faith, protected activity reports about the illegal activity that was taking place with the satellite transponder at Lionsgate's TV Guide Network. For if they did, then Nancy Coleman on behalf of Lionsgate could retaliate and discriminate against them too by instilling similar adverse employment actions on them.

My #1 Witness, Michael Nalepa has information that he can share with Lionsgate and with the Court about what was taking place at Lionsgate's TV Guide Network from October 15, 2010 through February 2011. According to what Michael Nalepa has told me, Lisa Germani wanted Tricia Daniels' employment with Lionsgate ended. Lisa was still retaliating against me from October 15, 2010 where I peacefully confronted her in her office about the harassment and sexual harassment campaign that she allegedly had going on me. That day, when I confronted Lisa in my act of "protected activity," I just needed Lisa to STOP It!

# TRICIA DANIELS

## Retaliation Act #5:

**Date of Protected Activity: February 11, 2011 through the remainder of my employment!**

**What Tricia Daniels Did: Nothing...I was being newly punished!**

# LIONSGATE

## Retaliation Act #5:

**Date of Retaliation: Week of February 14, 2011**

**The Retaliation That Officers of Lionsgate Took Against Me Were:**

After I paid my second visit on February 11, 2011 to Nancy Coleman's "Fitness-For-Duty" Doctor and was certified a second time as "Fit!"- To Be Returned To The Office" Nancy instead kept her own discriminatory retaliation campaign against me going on.

Nancy newly instilled the following new Human Resources employment actions against me.

- a) Nancy still did not return me to the office, as Nancy was supposed to do. She kept me as a Lionsgate telecommuter.

#29

b) Nancy at the same time made Lisa Germani, my tortfeasor, into my new direct and only supervisor.

c) Nancy Coleman also started telling me during our telephone calls together "The Company Wants You to Take Psychotropic Drugs."

Nancy in her breach of duty to Lionsgate and to me as a Lionsgate employee just kept favoring Lisa Germani and kept discriminating and retaliating and causing intentional infliction of emotional distress and career damage through her series of retaliations towards me.

Even when I jumped through Nancy's hoops by going for both "Fitness-For-Duty" appointments, Nancy still favored Lisa Germani over me. As stated earlier in this chart, to this day, I have no explanation as to why Nancy Coleman chose to favor Lisa Germani and discriminate against me. Perhaps it was due to the fact that Nancy and Lisa both have blonde colored hair and I, Tricia Daniels am a brunette?

## TRICIA DANIELS

### Retaliation Act #6:

**Date of Protected Activity: November 30, 2010**

**What Tricia Daniels Did: Nothing...I was being newly punished!**

#30

# LIONSGATE

## **Retaliation Act #6:**

**Date of Retaliation: May 5, 2011**

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

#### **Termination-**

On May 5, 2011, I got a telephone call not from Nancy Coleman, but instead the call came from Lisa Germani's boss, Paul Adler (VP of Programming) who had Eileen Kohler of Lionsgate's Human Resources Department on the phone line with him. I was told that my employment with Lionsgate was being terminated –but I was not given any reason why I was chosen for termination, especially so soon after I had jumped through all of Nancy Coleman's Human Resources retaliations and discrimination hula hoops which included go to Nancy's two "fitness-for-duty" exams just a couple of months earlier.

Lisa Germani wasn't being terminated.

My #1 Witness, Michael Nalepa has information on my termination that he can share with Lionsgate and with the Court. According to Michael, my termination was a "Happy Birthday Lisa Germani" present from Paul Adler (VP of Programming) to Lisa Germani. Lisa's birthday was quickly approaching, it fell on May 9, 2011. Lisa and Paul Adler were good personal friends both inside the office and in their "off-the-clock" personal time.

Interestingly, in October 2013, Paul Adler and his life partner, flew to the City of Detroit, Michigan to attend Lisa Germani's October 19, 2013 wedding to Mr. Brad Williams.

Also attending Lisa Germani's Detroit wedding was Kelly Kahl, (Senior Executive Vice President, CBS Primetime who was at the time as well as still is, a current sitting Board member of POP TV (formerly TV Guide

#31



Network). Kelly Kahl's wife, Kim, who was also in attendance at Lisa Germani's wedding to Brad Williams, also is currently affiliated with POP TV. Kim's current title is: Communications, Media and Talent Relations consultant for POP TV.

Now, Let's go back to May 4, 2011. I had two more weeks as a working employee of Lionsgate's TV Guide Network, and I had bookings to finish up as the next two weeks would carry on. Paul Adler had jumped off of the termination phone call and left me to talk with Eileen Kohler (Human Resources, Lionsgate).

Almost instantly after I told Eileen Kohler on the phone call that I was not supposed to be terminated, where I peacefully demanded to speak to Nancy Coleman or to another officer of the company, my company email and all of my access to all the work that I had in place, got terminated from my access. My company passwords instantly stopped working and I was not able to connect to company computer portals at all.

This new retaliatory act of not allowing me to complete my work or to have any email access for the final two weeks of my Lionsgate employment again caused me career damage with my business contacts and with my co-workers not to mention intentional infliction of emotional distress. I am a professional who wanted to work up until the last minute of the last day of my employment at Lionsgate to finish up bookings that were already on the calendar, as well as to secure future interviews and shoots that Lionsgate's TV Guide Network could still benefit from, even once my employment was wrapped.

I assert that my email shutdown and my access being cut-off from Lionsgate's company portal was another evil act of retaliation thrown into my path either intentionally from Lisa Germani, or from Paul Adler (Lisa Germani's good friend and boss) or from Nancy Coleman (EVP of Human Resources) as a final act of retaliation, or from Michael Nalepa (former employee who Lisa Germani allowed to still have access to Lisa's email account as well as other assets so that he could be a player in the continuing "game" against Tricia Daniels).

On May 4, 2011, when I had two more weeks of working employment, anyone who tried to reach me received an automated email response back to them that had quickly been created and lived on Lionsgate's

#32

computer servers. This automated response email stated that 'Tricia Daniels no longer worked for the company and to please contact Lisa Germani (via Lisa's email) instead.

## TRICIA DANIELS

### Retaliation Act #7:

**Date of Protected Activity: February 5, 2014**

### **What Tricia Daniels Did:**

In January 2014 and in February 2014, I was still a victim of outrageous activity coming from TV Guide Network's satellite transponder. I was getting badly burnt, bashed, tasered and satellite slapped from the "always on" satellite that was still rigged-up monitoring me.

### Briefly:

- a) "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" also known as "The Live Feeds," "The Core Group Family Satellite Broadcast," as "Nancy Coleman's Big Mess" and in 2014 known as "Michael Nalepa's Satellite Broadcast" was still going-on.
- b) Lionsgate's TV Guide Network was still misusing its FCC License, Satellite Transponder, Earth Stations, and broadcasting operations machinery.
- c) At this point in time, I had not worked for Lionsgate in almost 3 years, Lisa Germani had not worked for Lionsgate in almost 2 years, Michael Nalepa had not worked for Lionsgate in 3 years, and Nancy Coleman's employment with Lionsgate had ended during the 4<sup>th</sup> quarter of 2013.
- d) On February 5, 2014, I was getting badly burned by "Michael Nalepa's Satellite Broadcast" and a "burn bump" the size of a golf

ball had grown on my scalp due to the burnings, which the hair on my head wouldn't cover.

- e) My "burn bump" damage disfigured me and I was unemployed at this time. My burn bump was so unsightly that I couldn't imagine that any potential Human Resources professional would even want to hire me with such a disfigurement which I did the best I could to cover-up.
- f) I needed the burnings to stop. I was being burned many times each day and at times the wattage, the frequency of the burnings and the tasing and satellite slaps were so violent that I feared they had the power to break the bones in my body. So I sent a new series of "protected activity" emails to Lionsgate, reporting what I was still a victim of. These emails went to Jack Carey and cc'd was Eileen Kohler of Lionsgate's Human Resources Department.
- g) Included in one of my afternoon emails to Jack and Eileen were pictures that I had just taken with my IPAD camera so that I could show them the burn-bump damage/disfigurement on my scalp that resulted from the burning aspect of TV Guide Network's broadcasting machinery. I needed their help! Perhaps Jack could change the passwords to the transponder which would get satellite access removed from current and former co-workers who were still electronically monitoring me and committing burning assaults and batterys on my body through beams that originated allegedly from TV Guide Network's satellite transponder that were rigged to broadcast direct to my body.

Jack Carey had been employed by TV Guide Network since January 2004. Jack's longtime scope of duties in his employment as SVP, Operations for the network is to be the person in charge of all broadcasting technology for TV Guide Network, including satellite transponders, earth stations, transmitters, antenna controllers, the network's Tulsa, Oklahoma based broadcasting center, broadcast operations and engineering employees, etc.

Since October 2010, my co-workers have repeatedly stated that "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" was being



broadcast to me from the same machinery, equipment and satellite transponder that broadcasts TV Guide Network out to the network's customers and clients including the network's 81 Million viewer households.

I allege that Jack Carey for years has been intentionally negligent in his duty to Lionsgate employees such as myself and Julia Rolle (former Supervising Producer) who like me was also monitored by the network's army of broadcasting operations machinery and satellite transponder.

I allege that it is the scope of Jack Carey's duty to make sure that he and his team protect Lionsgate employees and former employees as well as the general public from intentional and negligent satellite harassment and satellite usage to commit assault, battery and burnings misconduct.

Jack Carey, who in his role as a senior management member of TV Guide Network (now POP TV) also has a responsibility not to retaliate against people like me who make a series of "protected activity" good-faith reports about criminal activities taking place at Lionsgate's TV Guide Network that I am experiencing firsthand--daily.

## LIONSGATE

### **Retaliation Act #7:**

**Date of Retaliation:** February 5, 2014

### **The Retaliation That Officers of Lionsgate Took Against Me Were:**

Soon after Jack Carey received my email containing the IPAD pictures of my "burn-bump" that grew because of TV Guide Network's "always on" satellite which just kept burning this area of my scalp, I allege that Jack Carey retaliated against me for making this new series of "protected reports" about wrongdoing at the company, particularly in Jack's own division, by getting David Mandell (General Counsel) involved.

# 35



That afternoon, I received an email from David Mandell. It wasn't your normal email. In fact, I had never seen an email like this before in my life, or in my entire professional career.

The email that I received from David Mandell was a threatening "Cease & Desist" order which caused incredible new damages to me.

David Mandell's alleged negligence in his scope of duties as General Counsel for Lionsgate's TV Guide Network where Mandell discriminated and retaliated against me, delivered in the form of his threatening "Cease & Desist" email, have caused me further career damages, social damages, life damages and continuing unnecessary pain, suffering and emotional distresses that come from the tort of still having TV Guide Network's broadcast satellite transponder assigned to monitor me 24/7, 365 days a year.

## TRICIA DANIELS

### **Retaliation Act #8:**

**Date of Protected Activity: Early August, 2015**

### **What Tricia Daniels Did:**

In August 2015, I sent my JAMS Arbitration Demand Package to David Mandell.

I really wanted to send my JAMS Arbitration demand package to Lionsgate's Ross Pollack. Ross Pollack is Lionsgate's current EVP of Human Resources. But it was "Brittany" from JAMS Arbitration (Lionsgate's official arbitration vendor) who told me by telephone that due to David Mandell's "Cease & Desist" email, that I needed to send my JAMS Arbitration Demand Package to David Mandell and not to Ross Pollack.

# 36

I was connected to Brittany when I called JAMS Toll Free telephone number, which is: 1-800-352-5267 because I had some procedural questions. I wanted to do everything correctly according to JAMS Rules, including 'Proof of Service.'

Within the pages of my August 2015, JAMS Arbitration Demand Package, I, in an act of "protected activity" respectfully and politely provided newly updated August 2015 information to David Mandell about currently continuing misuse of broadcasting operations machinery and satellite transponder activities which I was still experiencing firsthand as a post-employee of Lionsgate's TV Guide Network, which earlier this year had been rebranded into POP TV.

In my JAMS Arbitration Demand package of August 2015, I also provided new information to David Mandell about former co-worker Michael Nalepa and how Michael Nalepa, my #1 witness, and one of my leading tortfeasors has evolved into a victim.

I also cited legal terms that I found on the Google search engine, which were: respondeat superior liabilities, vicarious liabilities, qui facit per alium facit per se liabilities, and employer ratification liabilities.

## LIONSGATE

### **Retaliation Act #8:**

**Date of Retaliation: Between September 8-9, 2015**

**The Retaliation That Officers of Lionsgate Took Against Me Were:**

Between September 8-9, 2015, George Cuervos, Case Manager for JAMS Arbitration (Manhattan, NY branch office) called me on the telephone to tell me that Lionsgate is not going to be participating in

#37

arbitration with me.

Mr. Cuervos said that David Mandell (as the respondent for Lionsgate) in his reply to JAMS said that employees of my era at the company and/or of my level at the company were not signed to Final and Binding Arbitration agreements with JAMS. George Cuervos added that David Mandell in his reply to JAMS said that Lionsgate no longer had my "New Hire" form from February 6, 2009 in their files, it had been thrown-out or it's missing.

Mr. Cuervos asked me if I had a copy of my Lionsgate "New Hire" form that I signed on February 6, 2009 with the JAMS Arbitration clause in it—which I don't have. I handed it that day to Randy Young, the Lionsgate Human Resources Benefits & Compensation Director, who ran the 1:30pm "New Hire" benefits meeting where we filled-out our benefits election forms, signed Lionsgate employee clauses and heard about Lionsgate's company culture.

At the conclusion of the 1:30pm meeting, Randy Young that day took all of my filled-out, signed and dated forms back with him to Lionsgate's main Santa Monica headquarters. My forms included my benefits sign-up choices, my payroll and social security information, my medical insurance coverage choices, my 401K benefits choices, my election to sign-up for the JAMS Arbitration employee benefit, and more.

All of my information did immediately get entered into Lionsgate's Human Resources employee systems so that as a newly minted Lionsgate employee, I could start getting paid and start receiving company benefits. And that's exactly what happened! I worked for Lionsgate and I got paid and received my company benefits... I worked for Lionsgate and I got paid and I received my company benefits. This relationship went on and on weekly. I was fulfilling my employee contract/implied contract duties to Lionsgate and Lionsgate was fulfilling their employer contract/implied contract duties to me, their employee.

On September 9<sup>th</sup>, 2015, I emailed a copy of my unsigned Lionsgate employee separation agreement to George Cuervos so that he could see the JAMS Final & Binding Arbitration clause language contained within it which mirrored the JAMS Arbitration Clause that I signed on February 9, 2006 that was contained within Lionsgate's "New Hire" form. (Perhaps



this would suffice?)

In a new response back to me Mr. Cuervos emailed to me a copy of the current 2015 TV Guide Network Employee Manual which Mr. Cuervos received from David Mandell. Mr. Cuervos explained that he personally searched through the Employee Manual and he did not see any language within the manual about arbitration with JAMS.

It was odd to me at that moment that David Mandell would email to JAMS an employee manual from 2015 instead of emailing a blank copy of the Lionsgate "New Hire" forms and benefits election form containing the 'JAMS Clause' that newly hired Lionsgate and TV Guide Network employees fill out. An employee manual is a much different document than Lionsgate's "New Hire" form that has all of the company clauses including the employee benefit of JAMS arbitration clause that employees of my era at the company, all levels and all positions were presented with.

George Cuervos after looking at my unsigned Lionsgate Employee Separation Agreement told me either 2 or 3 distinct, individual times during our two telephone conversations that he feels that David Mandell, (the General Counsel respondent for Lionsgate) is lying to JAMS about me and employees from my era and my level at the company not being signed for arbitration through JAMS and about my "new hire" form from Feb 6, 2009 being thrown-out or missing from the company files.

Additionally Mr. Cuervos said that since there isn't a JAMS Arbitrator yet assigned to my case that he himself as the Case Manager is not able to subpoena from Lionsgate my "New Hire" form which contains the JAMS Arbitration Clause that I signed and dated with Lionsgate on February 6, 2009.

Mr. Cuervos further explained that if a JAMS Arbitrator had been assigned then he as the Case Manager would be able to do something more.

Next George Cuervos, the JAMS Case Manager suggested that I seek an employment attorney to advise me on this situation, as an employment attorney would be able to represent me and that an employment attorney might have ideas on other ways to go, be it ADR or other.



I allege that David Mandell by denying my JAMS Arbitration Demand has taken a new official act of retaliation and discrimination against me in which he chose to punish me for making "protected activity" reports of wrongdoing that still exists at the company that I relayed within the pages of my JAMS Arbitration Demand.

I'd like to make some points in this space:

Point #1: David Mandell was not an employee of Lionsgate in 2009, 2010, 2011, 2012 and for most of 2013.

Point #2: David Mandell was not even in the room on February 6, 2009, when I and 60-plus other employees of Lionsgate's new acquisition, TV Guide Network were given the choice of signing-up for the Lionsgate employee benefit of JAMS Arbitration, an employee benefit that would remain with us all during both our employment years as well as through our post-employment years, an employee benefit that covered any matter whatsoever that arose out of our employments with Lionsgate.

Point #3: On February 6, 2009 as I sat in the room with my 60-plus co-workers, I chose "YES" for this employee benefit, just as I had chosen "YES" to sign-up for this employee benefit in August 2004 with Rupert Murdoch's News Corp. when News Corp. was the managing owner of Gemstar-TV Guide. (News Corp's elective arbitration employee benefit was not administered through JAMS. If memory serves correct, I believe that News Corp's employee arbitration benefit used American Arbitration Association rules).

David Mandell, in early September 2015, somehow changed the terms and conditions and company benefits of the employment that I had with Lionsgate, when in an official response to JAMS, Mandell answered that employees of my era at the company and/or of my level at the company were not signed to Final and Binding Arbitration agreements.

David Mandell, in early September 2015, put me into a position where he has made me unequal to the 60-plus fellow employees who I sat in the February 6, 2009 meeting with and signed benefits forms concurrently with. David Mandell also has left me without remedy and relief.

#40

Interestingly, on September 10, 2015, the day after I heard from JAMS that David Mandell invalidated and cancelled-out my protected post-Lionsgate employee benefit of going through JAMS Arbitration with Lionsgate, I read a newly released press release about David Mandell on the internet.

On September 10, 2015, POP TV (formerly TV Guide Network) put out a press release announcing David Mandell's job promotion and his expanded slate of responsibilities for POP TV.

As September 2015 continued, I remained in a situation where David Mandell:

- a) Put me into a new unfair state of unequal terms and conditions of my Lionsgate employment
- b) I remained a victim of TV Guide Network's (now POP TV's) "always on" satellite, its burnings and assaults
- c) I remained the victim of an undeserved "Cease & Desist" punishment from David Mandell, sent to me on February 5, 2014.
- d) I remained Lawyer-less but in a new mini-round of attorney-shopping, I contacted a couple of potential attorneys but neither wanted to take on my situation with Lionsgate.
- e) I needed TV Guide Network (now POP TV's) "always on" satellite broadcast to end. This is what I went into Lisa Germani's office, over 5 years ago, on October 15, 2010, to confront her about, and 5-plus years later, it remains. Michael Nalepa and I are connected 24/7, daily by the magic or misuse of broadcasting operations technology.
- f) Still Lawyer-less, I was forced to file my September 18, 2015 EEOC complaint/claim.

On November 20, 2015, I received in the mail from the EEOC (U.S. Equal Employment Opportunity Commission) a "Right To Sue" Letter that was dated November 18, 2015.

#41

**SECTION EIGHT: LOG OF BURNINGS AND SATELLITE  
TRANSPONDER ASSAULT AND BATTERY THAT I WAS A VICTIM OF  
FROM AUGUST 15, 2015 TO OCTOBER 10, 2015**

LOG of Satellite Assaults that I was a victim to from August 15, 2015 to October 10, 2015. (I had decided to make a log for a couple of weeks' time of this unusual torture that I remain a prisoner and victim of.)

\*All battery and physical harm were allegedly delivered to my body from TV Guide Network (now POP TV's) satellite transponder.

\*All times of day logged below are Eastern Time Zone

\*Michael Nalepa (my #1 witness) is also my #1 tortfeasor and my #1 "satellite molester." Michael sometimes without regard for the amount of pain, suffering and emotional distress levels that he is putting me through keeps assaulting my body with broadcasting equipment that he personally has in his possession, which allegedly belongs to Lionsgate's TV Guide Network (now POP TV).

\*Michael Nalepa has not been employed by Lionsgate since January 2011. Why is Michael allowed to use Lionsgate's broadcasting equipment including satellite transponder to keep sending different wattages and different hurting taserings to my body through an "always on" satellite?

\*Clearly many times from August 2010 to December 8, 2015 ("the present") Michael has acted in intentional violence at me, allegedly using Lionsgate's broadcasting machinery such as satellite transponder, earth stations and more to painfully hurt me. At times, Michael just becomes a sicko, an "assault artist" and some new type of "sexual pervert" where he tries to cause painful permanent damage to my body that causes me to yell out loud at Michael to "STOP IT, You're hurting me!"

#42



\*As stated in my August 3, 2015 "Claim Notes To David Mandell" document that was included within my JAMS Arbitration Demand package:

In February 2014, I had recently seen an interview-article about Michael Nalepa that was published on the internet during calendar year 2013, which stated that in 2006, Michael Nalepa was diagnosed with Bipolar Disorder. I did some internet research about Bipolar Disorder and found that it was formerly called "manic depression." I found that Bipolar Disorder was described as a disorder associated with mood swings ranging from depressive lows to manic highs. In February 2014, as I remained a victim of "Michael Nalepa's Satellite Broadcast," I could only imagine the possible suffering and possible state of mind, emotional distress, unpredictability's and more that Michael Nalepa suffered through and coped with from moment to moment due to his suffering with Bipolar Disorder. It seemed that I was experiencing it "LIVE" firsthand as Michael Nalepa and I remained "glued" together through TV Guide Network's state-of-the-art satellite broadcasting technology. I am a person who doesn't hurt anyone, even if that person has hurt me. I just could not bring myself to hurt Michael Nalepa.

\*Michael Nalepa, presently, a 34 year old man, in December 2015, still continues to play the role of "Satellite Molester" and continues to hurt my body through his broadcast satellite usage.

\*How does Lionsgate's Richard Prell and TV Guide Network (now POP TV) officers David Mandell and Jack Carey explain to me how Michael is allowed his continued access to use POP TV's (formerly TV Guide Network's) satellite transponder and its beams? I, as the plaintiff feel that David Mandell and Jack Carey need to be interviewed in a deposition where they are both put under oath.

\*On October 17, 2015, Michael Nalepa's brother James Nalepa got married in the city of Maple Park, Illinois at the Acquaviva Winery. Michael and his life partner (named David Snow) both attended the wedding. Even though Michael Nalepa was away from his normal North Hollywood, California home where I assume that he has some sort of 'broadcasting man cave', I was getting assaulted violently. Question: How does Michael Nalepa explain this to Lionsgate, the Court and to me?

#43



Question: How does David Snow (Michael Nalepa's longtime life partner) explain what's up with Michael Nalepa's broadcasting? Since Michael and David Snow reside together in their North Hollywood home, it would be interesting to hear David Snow's perspectives.

**Saturday, August 15, 2015**

12:11-ish pm      Bone/Muscle crushing energy was delivered to my stomach area

**Monday, August 17, 2015**

8:14am      multiple energy hits were sent to my stomach and to one of my eyes

8:55am      energy was sent to my toes

10:36am      energy hit my stomach

3:15pm      another shot of energy hit my stomach

6:28pm      yet another shot of energy hit my stomach

8:52pm      a brand new shot of energy hit my stomach

8:57pm      stomach was hit---again!

9:12pm      burn to my left foot

10:34pm      a small satellite slap was delivered to my left foot

11:05pm      a satellite jabbed into my right eye

11:11pm      energy hit my right foot

11:26pm      energy hit the bottom of my left foot

11:42pm      energy hit my right leg

**Tuesday, August 18, 2015**

#44

12:10am burn to the bottom of my right foot  
12:38am satellite hit my neck (left side)  
12:39am burn to the bottom of my right foot  
2:10am energy zapped my stomach area  
Early am my toes were hit  
12:19pm my head got hit with squishing forceful energy  
2:38pm energy hit in my left eye  
2:49pm energy hit to my right foot  
2:58pm energy hit to my right hand  
3:00pm energy hit to my right breast, nipple area, across area  
3:05pm energy to my left pointer finger  
4:41pm light energy sent to my right bottom foot  
5:08pm another hit of energy to my right bottom foot  
5:22pm energy hit to the top area of toes on my left foot  
5:28pm energy hit to my right thigh  
5:56pm multiple hits of energy hit the back of my right thigh between  
6:36pm the front teeth in my mouth were hit with energy  
7:31pm another dose of energy hit my front teeth  
8:45pm energy hit my left breast  
9:58pm energy hit my vagina  
10:04pm energy hit the fingers on my right hand  
10:40pm energy hit my left thigh  
10:41pm energy hit my left foot

**Wednesday, August 19, 2015**

#45

12:44am burn to my left breast  
1:04am burn to my right big toe  
1:06am burn to my left breast  
6:23am BRAIN SQUASH-forced satellite action to the left side of my head  
7:15am burn to my back- right side  
7:23am burn to my upper thigh  
6:23pm burn to my pointer finger  
10:32pm multiple burns were made to my left hand (inside hand area)  
10:54pm another round of burns were made to my left hand  
11:11pm yet another round of burns were made to my left hand  
11:16pm more burns were made to my left hand  
11:24pm at this time even more burns were made to my left hand.

**Thursday, August 20, 2015**

12:29am a burn line down my stomach area was made (like a doctor was making an incision)  
4:43am burn to my right breast  
5:14am burn to the bottom of my right foot  
5:24am satellite was rigged to hit me in my right eye  
5:30am a new satellite hit arrived and again hurt my right eye

**Friday, August 21, 2015**

2:28am a blast of energy hit my right toes

#46

- 4:02am a blast of energy hit my left toes
- 4:15am BRAIN SMASH, left side of my head
- 4:26am energy sent to my Stomach (left side of my body)

Throughout this entire night, this was a night of forced sleep deprivation when Michael Nalepa was having a bad night and just would not allow me to sleep. Michael Nalepa can explain to Lionsgate and to the Court how he is able to cause sleep deprivation using broadcast satellites.

**Saturday, August 22, 2015**

- 9:16am energy hit to the right side of my stomach
- 9:21am energy hit to the fingers on my right hand
- 9:50am new burning energy was sent to the burn-bump area on my scalp
- 11:52am energy blast was sent to my right foot
- 11:55am a light energy hit arrived to my stomach (left side)
- 9:56pm burn to my left breast
- 10:06pm burn to my left bottom foot

**Sunday, August 23, 2015**

- 5:31am Vagina Burn-outside area of my vagina
- 5:40am another middle of the night hit to my body
- 8:11am Vagina Burn. Note-multiple burns were sent to my body from 8:11am to 8:24am on this day including a vagina burn and a left index finger burn.
- 8:56am Mouth burn (sent to my lips)
- 10:57am burn to my left foot
- 12:40pm energy was sent to my stomach

#47



1:03pm burn sent to my left foot  
2:49pm right foot burn  
3:03pm burn to my right thigh  
3:34pm warm energy wave was sent to my left foot  
3:52pm energy was sent to my right hand-two of my fingers were  
burned  
4:45pm energy was send into my right eye  
6:50pm my log says- SEXUAL ASSAULT! The inside of my vagina got  
assaulted.  
6:51pm- again my log says- SEXUAL ASSAULT! The inside of my  
vagina got assaulted a second time.

**Monday, August 24, 2015**

1:25am a burn was made to the left side of my scalp  
5:12am the satellite was rigged to lightly make a shot to my vagina  
6:24am significant vagina tasing  
9:09pm the satellite was rigged to burn my right breast  
10:36pm burn to the bottom of my right foot  
10:40pm burn to my right leg  
10:44pm burn to burn a group of my right toes  
10:56pm burn to my right thigh  
11:23pm burn to my left foot  
11:44pm burn to my right foot  
11:53pm burn to my left foot

**Tuesday, August 25, 2015**

#48

1:33am burn to my stomach (left side)  
1:34am burn to my right knee  
1:41am burn made to my burn-bump on my scalp  
2:01am another unique burn was made to the burn-bump area on my scalp  
2:29am burn to the bottom of my left foot  
2:44am a new unique burn hit my left foot  
2:44am burn to left foot  
2:47am burn to a group of fingers on my right hand  
3:10am burn to my right toes  
3:20am burn to my left thigh  
3:26am burn wave was delivered to my right bottom foot  
3:30am energy was sent to my left eye  
3:32am my right fingers were burned  
10:19am-ish my NECK! was assaulted  
10:23am energy hit my stomach area (left side)

**Wednesday, August 26, 2015**

3:29am a wave of energy was sent to my left foot  
3:41am left foot energy burn  
3:58am burn to stomach area (right side)  
4:09am burn to my right breast  
4:11am energy to my left toes  
4:15am painful energy wave was sent to the toes on my left foot  
4:22am a burn was sent to a group of fingers on my left hand  
4:23am a burn was sent to my left thigh

#49

4:27am a burn was sent to my left hand  
4:30am a burn was made to my back (on the left side)  
4:32am a satellite slap was made to my neck (on the left side)  
5:05am my right toes were burned  
6:55am the satellite was rigged to burn a lip of my mouth  
10:39am 3 different, unique burns were made to my right hand  
10:41am one new burn was made to my right hand  
10:46pm yet, another new burn was made to my right hand  
11:47am the satellite was rigged to hit me in my left knee

**Thursday, August 27, 2015**

8:15am Painful blasts were made to toes on my left foot during the night by the "always on" satellite  
9:35am burn to right toes  
9:39am a new burn to my right toes  
10:13am yet another burn to my right toes  
10:16am even another new burn to my right toes  
12:44pm a blast hit my right foot  
2:05pm a burn in a wave was sent to my right breast. It was painful

**Friday, August 28, 2015**

6:11am blast to my right leg

**Saturday, August 29, 2015**

12:37pm satellite slap was made to my stomach (left side)

#50

11:46pm Sexual assault- I was electrically charged inside of my vagina

11:56am Painful satellite burn shot was delivered to one of my eyes.

**Sunday, August 30, 2015**

6:47am hit in the left eye 2 or 3 unique times.

12:00pm hit in the left eye

12:02pm burn to my right foot

12:09pm burn to my bottom right foot

5:49pm eye burn was made to the outside of my right eye

6:07pm hit was made to the outside of my left eye

8:32pm-ish hit to left leg

8:48pm hit to left eye

8:57pm another unique hit to left eye

9:02pm another unique hit to my left eye

9:12pm hit to my left eye

10:04pm another hit to my left eye

10:49pm a new unique hit was made to my left eye

**Monday, August 31, 2015**

12:18am hit to my left eye

12:38pm another hit to my left eye

1:19am burn was sent to my left knee

1:30am hit was made to my left eye

1:34am two different back-to-back burns were made to my right arm

8:14pm energy was somehow sent to both sides of my stomach at the same time

#51



8:19pm energy was sent to my left arm and shoulder area

**Tuesday, September 1, 2015**

4:13am burning energy was sent to my stomach (left side)

4:18am another blast of Burning energy was sent to my stomach (left side)

4:27am yet another blast of burning energy was sent to my stomach (left side)

12:38pm a shot of energy was sent to my stomach-left side

1:18pm a blast of energy was sent to my left foot

1:53pm a small hit of energy was sent to my left eye

1:54pm another small hit of energy was sent to my left eye

2:03pm yet another small hit of energy was sent to my left eye

2:36pm satellite pressure was applied to the left side of my stomach

3:01pm energy hit to my left foot

3:04pm small amount of energy to my left foot

3:07pm another blast of energy to my left foot

3:08pm another new unique blast of energy was sent to my left foot

6:35pm a blast of energy was sent to the outside of my right eye

8:40pm energy hit was sent to my left stomach

8:50pm energy hit was sent to the back of my left shoulder

9:29pm a painful bad burst of energy was sent to my left stomach area. When I logged this blast, I made notes that this blast was intended battery and mean spirited. It caused a lot of pain and suffering.

9:33pm assault sent to my right leg, just below my knee

11:24pm energy was sent to my left leg

#52

**Wednesday, September 2, 2015**

12:57am and 12:58am- new blasts of energy were sent to my left foot

1:03am hit to the left eye

1:20am burn sent to the bottom of my right foot

1:49am burning spark was sent to the back of my left thigh while I was seated in a chair

3:31am energy was sent to my stomach (left side)

3:37am a new incident of energy was sent to the left side of my stomach

3:46am burning energy was sent to my left foot

3:51am energy was sent to the left side of my stomach

3:56am laser-sized blast of energy was sent to my knee, then to my right leg and then to my right breast.

4:11am energy burn was sent to my vagina (right side, outside area)

4:15am energy burn was sent to my vagina (left side, outside area)

5:08am a light energy burn was made to my left breast

10:23am the toes on my left foot were blasted

10:27am in a new unique occurrence, the toes on my left foot were blasted again

10:33am hurting energy was sent to my left foot

10:35am another blast of hurting energy was sent to my left foot

10:39am yet another blast of hurting energy was sent to my left foot

10:56am even blast of hurting energy was sent to my left foot

10:59am blast of energy was sent to my right foot

11:09am blast of energy was sent to my left foot

11:14am hurting energy was sent to my left foot

11:16am two more hurting energy blasts were sent to my left foot

#53

11:22am two more hurting energy blasts were sent to my left foot  
11:26am one new blast of energy was sent to my left foot  
6:22pm energy shot was sent to the left side of my stomach  
8:30pm another energy shot was sent to the left side of my stomach  
11:08pm satellite energy was sent to my left bottom-foot  
11:13pm burning blast of energy was sent to my right hip

**Thursday, September 3, 2015**

1:52am burn was sent to my left tushy  
3:09am burn was made to my left foot  
3:26am a new unique burn was made to my left foot  
3:45am a burn was made to my left leg  
3:57am burn to right foot  
3:59am laser burn made to my right thigh  
4:04am burn was made to my right arm  
4:31am energy hit to left side of stomach  
4:48am burn to left side of stomach  
4:54am burn to the outside of my right eye  
4:59am burn to my stomach (right side)  
5:04am sexual vibration of my vagina by satellite. Satellite energy was directed into my vagina to sexually assault me.  
5:07am energy burn to my right leg  
5:12am burn sent to the bottom of my right foot  
5:13am energy was sent to the right side of my stomach  
5:34am energy slap to my left wrist  
6:31am burn to my left foot

#54

6:34am another burn to my left foot  
6:37am burn to my right foot  
6:39am burn to my right foot  
6:43am burn to my left ankle  
7:00am energy to my stomach by my hip  
7:06am burning was sent to my face  
7:07am energy was sent to my stomach (left side)  
7:13am burn sent to my left thigh  
8:35am bad hurt sent to my right leg  
8:39am bad hurt sent to my left leg  
8:45am burn was sent to my breast nipple area  
8:54am energy was sent to my left foot  
9:08am energy was sent to the inside of my vagina  
5:53am energy was sent to the bottom of my left foot  
6:13pm laser burn to the left side of my stomach  
6:25pm energy was sent to my right leg  
10:02pm energy hit was sent to my left eye  
10:06pm another energy hit was sent directly into my left eye

**Friday, September 4, 2015**

1:47am energy sent to my lower stomach  
1:51am light energy hit to the outside of my vagina

#55



1:51am energy hit to my left behind  
1:52am burn made to a finger on my right hand  
1:56am burn made to a group of fingers on my left hand  
2:03am burn made to the bottom of my right foot  
2:04am hit to my left toe  
2:08am burn to my right hand  
2:15am burn was made on my stomach (right side)  
2:21am burn to right foot  
2:24am burn to left foot  
2:28am laser burn was made to my stomach (left side)  
2:38am burn was made to the outside of my vagina  
2:39am a new burn was made to the outside of my vagina  
2:55pm breast burn made to my right breast  
3:49am 3 unique burns were made to my body (one to my stomach, one to my leg, and one to my back)  
4:05am energy blast to my left foot  
4:13am energy blast to my left foot (in the toe area)  
4:19am energy sent to my left leg  
4:21am laser burn to the back of my left foot  
4:24am burn to my right thigh  
4:24am burn to my left foot  
4:28am another burn to my left foot  
4:50am energy was sent to the inside of my vagina, it was so bad that at this minute I named it as "sexual assault."  
5:05am energy blast was sent to my back

#56

5:08am two unique burns were made to the side of my left stomach followed by a unique burn that was made to my left back.

Around 7:17am NECK BLAST!

10:07am energy hit was sent to my stomach (left side)

10:38am energy was sent to my neck (left side)

12:11pm a very HOT wattage, painful energy burn was made to the right side of my stomach

12:15pm energy was sent to my right foot

12:19pm another blast of energy was sent to my right foot

12:28pm Light hit of energy to my right foot

12:43pm a new hit of energy was made to my right foot

1:55pm a burn was delivered to my left stomach

6:24pm burn to my right stomach area

9:35pm burn to my left foot

9:45pm energy sent to my right hand

9:46pm laser burn to my right thigh

9:47pm burn made to the bottom of my right foot

10:40pm there was a lite slap made to the outside of my right eye.

**Saturday, September 5, 2015**

12:06am burn to the left stomach area

12:58am burn to my left thigh

1:02am burn to my right thumb

1:02am just after the thumb burn I received a burn to my left hand

1:06am burn to my thumb

1:11am burn to my left toes

#57

1:47pm a bad bash to my left stomach was made

1:52pm burn to my right foot

**Sunday, September 6, 2015**

5:56am BRAIN SQUASH

6:18am burning to my left breast

6:35am burn to my left stomach

6:37am burn to my left stomach

6:44am burn sent to the burn bump area on my scalp

6:50am burn to right stomach

6:55am energy burn to left thigh

6:59am hit inside my left eye by satellite

7:32am genital vibrating inside my vagina via satellite

12:28pm energy to left stomach (side area)

12:35pm energy to mid stomach area

1:37pm energy to right stomach

9:18pm burning energy to the bottom of my right foot

9:43pm laser burn was sent to my left thigh

11:35pm energy was sent to my right stomach

11:37pm another round of energy was sent to my right stomach

**Monday, September 7, 2015**

12:38am energy burn to right hand and then another one was made to my left ankle

#58

12:40am energy to my right foot  
12:44am energy burn to my right breast  
12:47am satellite hit into my right eye  
1:16am burn to a group of toes on my right foot  
1:19am burn to right pointer finger  
2:52am energy was sent to my toes on my left foot which caused me a lot of pain  
4:06am burning energy was sent to my body which hurt my calf bone in my right leg  
10:46am energy was sent to my left toes  
10:58am electricity burn to right side of my stomach  
8:36pm satellite zap of energy was sent to the inside of my vagina  
8:53pm two different laser energy zaps were sent to my right ankle  
9:27pm burn to my right arm

**Tuesday, September 8, 2015**

1:45am burn wave was sent to my mid-stomach area  
2:12am Calf Crushing energy was sent to my left leg  
2:32am zap sent to the inside of my right eye  
2:33am zap was sent to my right ankle  
2:39am three different burns were sent to my right hand  
2:43am satellite burn to my left chin  
2:44am burn to my right hand  
2:49am burn to my right hand  
3:08am energy zap to my left eye  
5:21am brain smashing (left side of my brain was smashed by satellite)

#59



5:31am energy blast wave across my stomach was sent to me via satellite  
6:02am burn to my left breast  
6:04am zap to my right eye  
6:18am burn to my right shoulder  
6:21am burn to my right thigh  
7:32am burn to my left foot  
7:43am satellite energy was sent to my vagina  
8:14am burned a group of my toes (left foot)  
8:49am burn to left thigh  
8:51am burn to my right breast  
8:58am energy zap inside my vagina  
11:31am energy was sent to my right toes  
11:41am satellite energy was sent to my vagina

**Wednesday, September 9, 2015**

1:53ish am burn to my left stomach  
2:00am burn to my left foot  
2:07am burn to my right thigh  
2:35am energy burn to my body  
2:44am energy blast to my big toe (left foot)  
9:34am a bit to my left stomach area occurred just after a series of hits to different parts of my body preceded this.  
9:40am energy assault and vibrations were made inside my vagina that were perverted. Again, I was clearly being sexually assaulted via satellite.  
9:43am brain smash to the left side of my head. At this moment I told myself "I want this freak in jail."

#60

11:16am energy was sent to my big toe (left foot)

**Friday, September 11, 2015**

Today was a day where Michael Nalepa increased the wattage by making it higher and also increased his frequency and severity of his attacks on me.

Around 3:15am there were three unique blasts of energy to the big toe on my left foot

3:21am another unique blast of energy to the big toe on my left foot

3:25am unique blast of energy to the big toe on my left foot

3:29am unique blast of energy to the big toe on my left foot

3:32am unique blast of energy to the big toe on my left foot

3:34am unique blast of energy to the big toe on my left foot

3:36am unique blast of energy to the big toe on my left foot

3:42am unique blast of energy to the big toe on my left foot

3:55am unique blast of energy to the big toe on my left foot

3:58am unique blast of energy to the big toe on my left foot

3:59am unique blast of energy to the big toe on my left foot

4:20am unique blast of energy to the big toe on my left foot

4:25am unique blast of energy to the big toe on my left foot

4:26am unique blast of energy to the big toe on my left foot

4:27am unique blast of energy to the big toe on my left foot

4:51am unique blast of energy to the big toe on my left foot

5:10am blast of energy to left stomach (side)

5:16am blast of energy was sent to hurt my left big toe

5:23am big blast of energy to my left toe

#61

5:29am another big blast of energy to my left toe  
5:38am energy blast to the side of my big toe (left foot)  
5:40am energy blast to a group of toes on my right foot  
5:50am energy was sent to the bone in my left big toe  
5:53am a follow-up assault of energy was sent to the bone in my left big toe  
6:47pm laser burn to left thigh  
8:28am bad extended burn to my right breast  
8:41am small zap of satellite energy to my right breast  
10:29am two satellite zaps to my brain, left side  
10:32am satellite energy was sent to my left foot  
10:35am energy was sent to my stomach, left side  
10:45am two different shots of energy were sent to my left big toe  
10:47am two different burns were delivered to my right breast  
11:09am energy was sent to the big bone in my left big to  
11:15am energy was sent to my breast (left side breast)  
11:39am energy was sent to my breast (left side breast)

**Sunday, September 13, 2015**

4:46am to 4:47am—during this minute there was a sicko sexual assault on my right breast where the “always on” satellite would not stop zapping my breast, repeatedly with energy. It was very painful and the repeated zapping burnt my breast badly. It was during the middle of the night.

#62

7:55am a repeat assault like the one above was made to my right breast. The satellite just wouldn't stop zapping my breast.

**Friday, October 9, 2015**

12:46am bad energy blast to my left foot  
1:37am mild energy blast to my left foot  
5:01am blast to left stomach-side  
12:30pm blast to left stomach-side  
4:34pm laser burn to my back, left side  
5:38pm burn, back of my right thigh  
6:19pm burn to my right thigh  
8:13pm satellite slap on my left knee cap  
8:23pm another satellite slap on my left knee cap  
8:25pm energy to my left toe- the one that once was broken, the exact bone. From past assaults Michael Nalepa knows this and I have been warning him not to assault me here.  
8:40pm burn to left leg, above ankle  
9:51pm burn to bottom of left foot  
10:02pm laser burn to stomach, right side

**Saturday, October 10, 2015**

3:48am bad blast and bone crush to left side of stomach

From 3:48am to 3:05pm- there were a lot of burns and bashes sent to my body, too many to list

#63



11:21pm energy zaps were sent to into my inner ear and it made my inner ear hurt.

**SECTION NINE: THE FACTS OF MY CASE ARE AS FOLLOWS:**

**PARTIES**

#1. Plaintiff Tricia Daniels is a television executive and resident of New York City (Queens County).

#2. Defendant Lionsgate Entertainment Corp. ("Lionsgate") is a corporation that trades under the stock symbol NYSE: LGF, doing business in New York City, New York State, and throughout the world as a motion picture and television production and distribution company.

#3. Lionsgate is an employer covered by the provisions of the EEOC, ADEA and ADA

#4. On August 9, 2004, in Los Angeles, California, I entered into the employment of TV Guide Network as a Talent Booker and soon after was given the official title of Senior Story Editor. Although my title was a little bit different than the normal industry titles of Talent Producer, Editorial Booking Producer, Talent Booker and Talent Executive, my duties remained similar to the duties of an Editorial Talent Booking Producer.

#5. Throughout my employment with TV Guide Network, the network changed ownerships a few times.

(a) From August 9, 2004 to May 2, 2008, Gemstar-TV Guide was 41% owned and managed by Rupert Murdoch's News Corp.

(b) From May 2, 2008 to January 6, 2009, Gemstar-TV Guide was owned and managed by Macrovision

(c) From January 6, 2009 through the remainder of my employment, TV Guide Network was owned and managed by Lionsgate. At one point Lionsgate sold a 49 per cent ownership interest in the network

# 64

to One Equity Partners but on March 26, 2013, One Equity Partners sold their stake to CBS Corp. Today Lionsgate and CBS Corp. own TV Guide Network as a 50/50 joint venture.

(d) From January 6, 2009 to the date of the filing of this complaint, Lionsgate officially has been TV Guide Network's managing owner. All Human Resources functions, Compliance functions, Employee Manual functions, Worker's Compensation functions, Employee Separation Agreement legal functions, Benefits functions such as JAMS Arbitration, Unum Disability, 401K plan, etc. are managed and run daily by Lionsgate.

#6. My tenure as Senior Story Editor for TV Guide Network was one of unparalleled success. Throughout my tenure, my successes at TV Guide Network daily raised the company's stature as a journalistic entertainment news reporting network.

#7. During my employment, TV Guide Network had great success with its timely 'day and date' programming. TV Guide Network's programming had editorial vision and was dedicated to informing, entertaining and enriching our viewers lives. TV Guide Network developed an editorial voice that both the entertainment industry and also our viewers could count on.

#8. My programming ideas and my bookings contributed to overall company efforts to increase the network's number of viewers, contributed to overall company efforts to increase the network's 'length of tune-in' by each viewer; my bookings, story ideas and home runs delivered daily helped to increase the network's ratings, and helped to create profits for TV Guide Network's owners.

#9. The following section, although far from complete, shows some of my booking successes and contributions to TV Guide Network for the years from mid-2006 through calendar year 2010.

## **2006**

Alicia Keys

Angelina Jolie

Beyoncé

Cameron Diaz

Cate Blanchett

Eddie Murphy

# 65

Ewan McGregor	George Clooney	Helen Mirren
Hilary Swank	Jack Black	Jamie Foxx
Jennifer Hudson	Jeremy Piven	Jessica Biel
Jude Law	Justin Timberlake	Kate Winslet
Leonardo DiCaprio	Mary J. Blige	Matt Damon
Matthew McConaughey	Renee Zellweger	Robert De Niro
Samuel L. Jackson	Sylvester Stallone	Tina Fey
Tobey Maguire	Will Smith	

**2007**

Adam Sandler	Adrien Brody	Amy Adams
Anjelica Huston	Barry Levinson	Ben Affleck
Billy Bob Thornton	Bindi Irwin & Terri Irwin	Brett Ratner
Cate Blanchett	Chris Rock	Chris Tucker
Courteney Cox	Dane Cook	David Duchovny
David Schwimmer	Denzel Washington	Diane Keaton
Don Cheadle	Dustin Hoffman	Dwayne Johnson
Ewan McGregor	Geoffrey Rush	Guillermo Del Toro
Guy Ritchie	Halle Berry	Heath Ledger
Helen Mirren	Jackie Chan	Jake Gyllenhaal
Jamie Foxx	Jason Bateman	Jeff Bridges
Jennifer Garner	Jennifer Lopez	Jim Carrey
Joaquin Phoenix	John C. Reilly	John Cusack
Jon Bon Jovi	Jonah Hill	Kenneth Branagh
Kevin Bacon	Kevin Costner	Kirsten Dunst
Laura Prepon	Liam Neeson	Mark Wahlberg
Matt Damon	Matt Dillon	Michael Caine
Michael Chiklis	Michael Douglas	Michael Moore

#66

Miley Cyrus	Morgan Freeman	Natalie Portman
Nicolas Cage	Nicole Kidman	Owen Wilson
Patrick Dempsey	Philip Seymour Hoffman	Pierce Brosnan
Queen Latifah	Reese Witherspoon	Richard Gere
Ryan Gosling	Ryan Reynolds	Samuel L. Jackson
Sandra Bullock	Seth Rogen	Shia LaBeouf
Shirley MacLaine	Sigourney Weaver	Sir Anthony Hopkins
Tobey Maguire	Tommy Lee Jones	Tori Spelling

Satellite Media Tour Interviews included: Bryan Adams, John Mellencamp, Jane Krakowski & Tina Fey, Jessica Biel, Kelly Clarkson, Tyler Perry, Brad Paisley, Denis Leary, LeBron James, Billy Ray Cyrus, Jon Hamm, Mo'Nique, Jon Voight, Ozzy Osbourne, Tony Bennett, will.i.am, Steve Carell, Glenn Close, Phil Donahue, Gene Simmons

## **2008**

Adam McKay	Adam Sandler	Al Roker
America Ferrera	Andy Garcia	Anne Hathaway
Ashton Kutcher	Ben Stiller	Bill Murray
Blake Lively	Brendon Fraser	Cameron Diaz
Cedric the Entertainer	Charlize Theron	Cheech & Chong
Chris Rock	Colin Farrell	Colin Firth
Dame Edna	Daniel Craig	Dennis Hopper
Dennis Quaid	Diane Lane	Dolly Parton
Donald Trump	Drew Carey	Dustin Hoffman
Ellen DeGeneres	Emma Thompson	Eric McCormack

#67



Dwayne Johnson	Edward Norton	Elizabeth Banks
Eva Longoria	Forest Whitaker	Freida Pinto
George Clooney	George Lucas	Hugh Jackman
Hugh Laurie	Keanu Reeves	Isla Fisher
J.J. Abrams	Jack Black	James Belushi
James Franco	Jamie Lee Curtis	Javier Bardem
Jennifer Aniston	Jodie Foster	John Cusack
John Landis	John Travolta	Josh Brolin
Judd Apatow	Julianne Moore	Justin Timberlake
Kate Beckinsale	Kate Hudson	Katie Holmes
Keira Knightley	Kelsey Grammer	Kenneth Branagh
Kermit the Frog	Kevin Costner	Kiefer Sutherland
Kristen Stewart	Kristin Chenoweth	Leonardo DiCaprio
Liev Schreiber	Malcolm McDowell	Marisa Tomei
Mark Ruffalo	Mark Wahlberg	Martin Lawrence
Matt Lauer	Matthew Broderick	Melissa McCarthy
Meredith Vieira	Mario Batali	Mickey Rourke
Mike Myers	Miley Cyrus	Miss Piggy
Neil Patrick Harris	New Kids on the Block	Nick Cannon
Olivia Wilde	Owen Wilson	Paris Hilton
Patricia Arquette	Patrick Dempsey	Penélope Cruz
Rachel Weisz	Ray Romano	Reese Witherspoon
Renee Zellweger	Richard Gere	Robert Downey, Jr.
Robert Pattinson	Robin Thicke	Rosario Dawson
Russell Crowe	Ryan Reynolds	Samuel L. Jackson
Saoirse Ronan	Sarah Jessica Parker	Scarlett Johansson
Seann William Scott	Selena Gomez	Seth Rogen
Shailene Woodley	Shia LaBeouf	Simon Helberg

#68

Tina Fey	Tom Cruise	Tommy Hilfiger
Viggo Mortensen	Will Ferrell	William Shatner
Woody Harrelson	Will Smith	Zac Efron

Satellite Media Tour Interviews included: Beyoncé, Kevin Spacey, Mandy Moore, Randy Jackson, The Jonas Brothers, Tom Bergeron, Dermot Mulroney, Josh Groban, Joy Behar, Donny & Marie Osmond, Ty Pennington, Uma Thurman, Marcia Cross, Lester Holt, Kyra Sedgwick, Morgan Freeman, Valerie Bertinelli, Jon Hamm, Michael Phelps Live from Beijing on 8/19/08, Kenny Rogers, Brooke Shields, Anthony Edwards, Harry Connick, Jr., John Malkovich, Anna Faris

**2009:**

Aaron Paul	Abigail Breslin	Adam Sandler
Al Roker	Alec Baldwin	Amy Adams
Andy Garcia	Ang Lee	Anthony Mackie
Antonio Banderas	Armand Assante	Ben Affleck
Billy Bob Thornton	Blake Lively	Bob Newhart
Bradley Cooper	Brendan Fraser	Bruce Willis
Bryan Cranston	Cameron Diaz	Channing Tatum
Chris Hemsworth	Chris Klein	Chris Pine
Chris Rock	Christian Bale	Clive Owen
Dan Rather	Daniel Radcliffe	Debbie Reynolds
Denis Leary	Denzel Washington	Drew Barrymore
Dwayne Johnson	Edward Norton	Elijah Wood
Ellen Page	Ewan McGregor	Francis Ford Coppola
Gabourey Sidibe	Gerard Butler	Harry Connick, Jr.
Hayden Panettiere	Hilary Swank	Holly Hunter
Hugh Grant	Hugh Jackman	Hugh Laurie
Isla Fisher	J.J. Abrams	Jack Black
Jada Pinkett Smith	Jake Gyllenhaal	James Cameron

#69

James Spader	Jamie Foxx	Jason Bateman
Jason Schwartzman	Jennifer Aniston	Jennifer Garner
Jeremy Piven	Jeremy Renner	Jerry Bruckheimer
Jessica Biel	Jessica Lange	Jewel
Jimmy Page	Jimmy Smits	John Krasinski
Johnny Depp	Jon Favreau	Josh Duhamel
Justin Long	Kate Beckinsale	Kathryn Heigl
Kathy Ireland	Keanu Reeves	Kenny Ortega
Kevin Bacon	Kevin James	Kevin Spacey
Kristen Bell	Kristen Stewart	Kristen Wiig
Larry David	Liam Neeson	Lisa Kudrow
Marc Wahlberg	Mariah Carey	Mary Steenburgen
Matt Damon	Matt Lauer	Matthew McConaughey
Matthew Perry	Megan Fox	Melissa Leo
Meryl Streep	Michael Cera	Michael Moore
Michelle Pfeiffer	Michelle Rodriguez	Mike Judge
Miley Cyrus	Morgan Freeman	Naomi Watts
Nia Vardalos	Nicolas Cage	Paris Hilton
Penn & Teller	Quentin Tarantino	Rachel McAdams
Ray Romano	Renee Zellweger	Richard Gere
Ricky Gervais	Rob Lowe	Robert Downey, Jr.
Robin Williams	Ron Howard	Rose Byrne
Russell Crowe	Ryan Reynolds	Salma Hayek
Sam Mendes	Sam Worthington	Samuel L. Jackson
Sandra Bullock	Sarah Jessica Parker	Scott Bakula
Seth Green	Seth Rogen	Shia LaBeouf
Sienna Miller	Sigourney Weaver	Steve Martin
Steve Zahn	Téa Leoni	The Jacksons

#70

The Jonas Brothers	Tim Allen	Tim Burton
Tim McGraw	Tobey Maguire	Tom Arnold
Tom Ford	Tom Hanks	Tom Selleck
Tori Spelling	Trisha Yearwood	Ty Burrell
Tyler Perry	Viggo Mortensen	Vince Vaughn
Will Ferrell	Woody Harrelson	Zac Efron
Zooey Deschanel		

Satellite Media Tour Interviews included: Jerry Rice, Kyra Sedgwick, Wesley Snipes, Mark Harmon, Sigourney Weaver, Mira Sorvino, Eric McCormack, Kirk Cameron, Kathryn Hahn, Rainn Wilson, Zachary Levi, Patricia Arquette, Jon C. McGinley, Jimmy Fallon, Virginia Madsen, Taraji P. Henson, Trisha Yearwood, Benjamin Bratt, Nick Cannon, Timothy Hutton, Brandi Chastain, Jay Leno, Seth Meyers, Dennis Hopper, 50 Cent, Larry The Cable Guy, Billy Ray Cyrus, Marion Cotillard, Rob Marshall

**2010:**

Aaron Paul	Adam Sandler	Amanda Seyfried
America Ferrera	Andre Agassi	Angelina Jolie
Anne Hathaway	Annette Bening	Anthony Robbins
Ashton Kutcher	Ben Affleck	Benicio Del Toro
Bill Cosby	Bill Murray	Bradley Cooper
Brendan Fraser	Brooke Shields	Bruce Willis
Carey Mulligan	Channing Tatum	Chris Pine
Chris Rock	Christina Aguilera	Cindy Crawford
Colin Firth	David Caruso	David Foster
Demi Moore	Dennis Quaid	Denzel Washington
Diane Lane	Drew Barrymore	Edward Norton
Emily Blunt	Emma Thompson	Eva Longoria

71



Ewan McGregor	Forest Whitaker	Gabourey Sidibe
Gary Oldman	Gary Sinise	George Lopez
Gerard Butler	Green Day	Greg Kinnear
Gwyneth Paltrow	Harrison Ford	Helen Mirren
Jackie Chan	James Cameron	James Franco
Jamie Foxx	Jane Lynch	Janet Jackson
Jason Bateman	Javier Bardem	Jay Baruchel
Jeff Bridges	Jennifer Aniston	Jennifer Lopez
Jeremy Renner	Jesse Eisenberg	Jillian Michaels
Jim Carrey	Joan Jett	John Cusack
John Travolta	Johnny Depp	Jon Favreau
Jonah Hill	Josh Brolin	Josh Duhamel
Josh Grobin	Jude Law	Julia Roberts
Justin Timberlake	Kate Bosworth	Katherine Heigl
Katy Perry	Kelly Ripa	Kevin James
Kevin Spacey	Kristen Stewart	Larry David
Leonardo DiCaprio	Lisa Kudrow	Mark Wahlberg
Matt Damon	Matthew Broderick	Mel Gibson
Melissa Etheridge	Michael Douglas	Mila Kunis
Miley Cyrus	Milla Jovovich	Naomi Watts
Natalie Portman	Neil Patrick Harris	Nicolas Cage
Oliver Stone	Olivia Newton-John	Owen Wilson
Paul Bettany	Paul Giamatti	Philip Seymour Hoffman
Pierce Brosnan	Queen Latifah	Ralph Fiennes
Ray Romano	Reese Witherspoon	Robert Downey, Jr.
Robert Pattinson	Russell Brand	Russell Crowe
Ryan Reynolds	Sam Rockwell	Sam Worthington
Samuel L. Jackson	Shia LaBeouf	Sigourney Weaver

#72

Sissy Spacek	Steve Carell	Sylvester Stallone
The Jonas Brothers	Tim McGraw	Timothy Dalton
Tracy Morgan	Tyler Perry	Wanda Sykes
Wendy Williams	Will Ferrell	Wolfgang Puck
Zac Efron	Zach Galifianakis	Zoe Saldana

Satellite Media Tour Interviews included: Willem Dafoe, Kenny Ortega, Steven Seagal, Carey Mulligan, Kirstie Alley, Holly Hunter, Lea Michele

#10. By winter 2010, the booking levels that I achieved became a successful force for the continuing success and growth of TV Guide Network's tent pole "Hollywood 411" show. Through the years my bookings also drove other shows on the network such as

- TV Guide Network's "Big Movie Premiere" Specials" franchise
- TV Guide Network's "What's On DVD" show
- TV Guide Network's "Watch This" and "Watercooler" TV shows
- TV Guide Network's Annual Awards Season Coverage including our "Live From the Red Carpet" broadcasts, and more.

#11. By April 20, 2010, TV Guide Network was launching plans to increase film coverage on our "Hollywood 411" show so that we could give more airtime to covering new major studio releases and also give more airtime to covering more independent and specialty film releases, that I was booking the stars of, as well as booking stories and sidebar stories about, for programs on our network.

#12. A meeting was planned for Monday, April 26, 2010 by Paul McNamara, then Executive Producer of the then current version of our "Hollywood 411" show. This meeting was to take place from 11:00am to 12:00pm.

#13. The planned meeting was a small meeting that was to be attended by Paul McNamara (Executive Producer), Chris Lemire (Supervising Producer), Tricia Daniels (myself), and by Tom McMahon (Producer). Paul

# 73

McNamara left it as a "possibility" that once the day of the meeting arrived, that Paul would possibly invite one or two more co-workers to this planning and strategy meeting.

#14. I figured that meant that Paul McNamara would possibly invite Matt Singerman to the meeting. (Matt's title was Senior Vice President of Programming and Production, TV Guide Network).

#15. Paul McNamara, Matt Singerman, Chris Lemire and Julia Rolle (Supervising Producer of TV Guide Network's "Hollywood 411" show) had all previously worked for Rupert Murdoch's Fox News Channel and when all 4 of these former Fox News Channel super-journalists joined TV Guide Network they brought in with them a whole new era of journalistic excellence to our network. Journalistic excellence is excellence that I through my entire career have been personally subscribed to since my very first day working in television, back in September 1977.

#16. When, Monday, April 26, 2010 arrived, sadly our meeting didn't happen because Tom McMahon needed to be in the field that day on a couple of big shoots that I had booked and the meeting for the newly expanded film centric version of our "Hollywood 411" show (the weekly show which was hosted by Chris Harrison) needed to be postponed to a future unspecified date.

#17. April 2010 turned into May, and May turned into June. Under Paul McNamara and Chris Lemire's leadership it was an exciting new chapter of growth for TV Guide Network's "Hollywood 411" show. You could feel the growth and success of the show in the air within our office building, you could feel the staff's proudness of what our "Hollywood 411" show had grown into, and you could see by the smiles on everyone's faces their commitment to working as hard and as best as they could to keep the show growing.

#18. It was clear that the current producing team of Paul McNamara, Chris Lemire and Julia Rolle who were in charge of TV Guide Network's "Hollywood 411" show with Chris Harrison as our host, had grown and taken the show to its next level.

#19. On or about Monday, June 7, 2010, or Tuesday, June 8, 2010, while I was in Paul Adler's office having a conversation with him about our

#74

upcoming "Harry Potter" film coverage and also about our "Harry Potter" Orlando, Florida theme park coverage that we were putting together for the network, Paul Adler (Title: V.P. of Production) revealed to me that both Paul McNamara and Chris Lemire were both about to have their employments terminated.

#20. That day, it made no sense to me that a) Paul Adler would even tell this information to me and b) that any change in the "Hollywood 411" managing producing team of Paul McNamara, Chris Lemire and Julia Rolle would even be made. As stated above, this team had taken TV Guide Network's "Hollywood 411" show to new heights. It made no sense! But I kept my mouth closed about it and didn't even make any comments to Paul Adler about it, as I continued discussing "Harry Potter" coverage with Paul Adler.

#21. Interestingly, Paul Adler's reveal to me that early June 2010 day wasn't the first time in recent days that a TV Guide Network co-worker had revealed to me some facts about another executive's forthcoming termination.

#22. Days earlier, on either Wednesday May 26, 2010 or on Thursday, May 27, 2010, Talent Booking Department co-worker Lisa Germani phoned me while I was at my desk working. Lisa's call was strictly for the purpose to tell me to come upstairs and poke my head into her office because she had some 'big news' that day to share with me.

#23. After I finished my work late afternoon that May 26, 2010 or May 27, 2010 day, I went upstairs and poked my head into Lisa's office. Lisa worked on the 7<sup>th</sup> floor of our building, I worked on the 6<sup>th</sup> floor. The big news that Lisa shared with me this day was that Matt Singerman (Title: Senior Vice President of Programming and Production) was let-go from the company and that word of this filtered to her through Paul Adler (Vice President of Programming and Production) who was told by Robyn Zabel (VP, Programming Finance and Administration)

#24. Per Lisa, during this "poke-my-head-into-her office" session, Paul Adler was going to tell Matt Singerman to call his lawyer over the imminent Memorial Day weekend because Robyn told Paul that Lionsgate would

#75



likely be trying to cut Matt's amount of weeks left as well as the severance compensation that Matt would perhaps be receiving upon his termination. Lisa Germani also stated to me that she'd heard talk that Lionsgate in the near future was quite possibly going to cut the amount of severance that all employees would be receiving upon termination.

#25. As I stood there in Lisa's office, hearing this news about Matt Singerman (who was one of my direct bosses, my other boss was Scott Woodward), I wondered why Lisa and Paul and Robyn would be privy to any forthcoming executive changes in staff. If Lionsgate was going to be making a change in Matt Singerman's employment and in Matt's severance terms or contract terms then these pieces of information would not be pieces of information that Robyn, Paul and Lisa should know in advance and should be discussing and sharing.

#26. From my many years in the television industry where I worked for ABC-TV's Good Morning America, as well as for ABC-TV Network News, and for other companies ranging from MTV Networks, Paramount Domestic Television, Sony TV, the CBS Television Network and for FOX TV, I know that changes in executive staff are normally handled by business affairs departments, and when a change unfortunately needs to be made in executive staff, due to a new change in direction for any company that the change in staff is a hush-hush thing that is handled secretly, effectively and properly by Business Affairs. I also know that any change in terms of an employment contract, such as severance reduction is between the executive employee and business affairs.

#27. It made no sense to me that May 26, 2010 or May 27, 2010 day that Lisa Germani (Director of the Talent Booking Department for TV Guide Network) would be privy in advance to this type of information and that she'd be sharing this inside knowledge so openly with me.

#28. And going back to that moment on June 7, 2010 or June 8, 2010 as I stood in Paul Adler's office where he had just informed me that Paul McNamara and Chris Lemire's employments were about to be terminated, it all made no sense whatsoever.

#29. Let's move ahead in the calendar to the date of: Tuesday, June 22, 2010. I was busy doing my work when co-worker Fernita Wynn (Title: Senior Talent Booker) called me on our office telephone to discuss that

#76

Paul McNamara and Chris Lemire would no longer be the producing team in charge of our "Hollywood 411" show. I asked Fernita if Julia Rolle would be staying on. Fernita replied that Julia probably would be staying on because quote-"Julia is too fragile." Fernita continued to say that the company probably would not be terminating Julia's employment because of Julia's state of fragile.

#30. "FRAGILE?" -It was astounding to me that Fernita would call Julia Rolle "Fragile" in any way. Fernita knew Julia very well. I hardly knew Julia at all—but I had never seen Julia in any sort of fragile state. In fact, it was the exact opposite. I was just starting to get to work with Julia a little bit. Although Julia was a member of our "Hollywood 411" show's managing producing team, I worked mostly with Paul McNamara and with Chris Lemire and only here and there with Julia.

#31. In June 2010, I had actually just worked the most 'one-on-one' with Julia that I had ever had. From June 10, 2010 through June 12, 2010, I worked with Julia on our network's coverage of the new film release "Jonah Hex." On Saturday, June 12, 2010, Julia interviewed the film's star Josh Brolin, and the night prior, on Friday night June 11, 2010 at 6:30pm, Julia attended the screening of "Jonah Hex" at the Mann Chinese Theatre, (which since January 2013 has been known as the TCL Chinese Theatre.

#32. From about Tuesday June 8, 2010 through Friday, June 12, 2010, I also worked with Julia on TV Guide Network's "Harry Potter Theme Park Coverage" that I set up for TV Guide Network's "Hollywood 411" show. On Saturday night, June 12, 2010, just after her interview with Josh Brolin, Julia was going to be flying from LAX (Los Angeles Airport) to Orlando, Florida to start producing Orlando-based "Harry Potter" segments that would be airing within the Friday, June 18<sup>th</sup>, 2010 edition of our "Hollywood 411" show.

#33. On Wednesday, June 23, 2010, it was the first time since Thursday, June 10, 2010 that I saw Julia back in the office from the Florida trip. I wanted to ask Julia if everything went okay, if she encountered any problems, if all of the set-up I did worked out the way it was supposed to

#77

have worked out, if there was anything better or different that I could do next time on my logistics booking sheets that could be additionally helpful to her on a next show origination trip, etc. But strangely, I never got to ask Julia anything that day...or ever again.

#34. On Wednesday, June 23, 2010, after I finished completing some booking sheets, I got up from my desk to walk to the elevator so that I could start my lunchbreak and as I was walking I saw a very unusual sight.

#35. The door to one of our conference rooms was open, Julia was lying flat, face-up on the floor, Fernita Wynn was walking out of the conference room and there was a stretcher in the hallway outside of the conference room with our building security guard standing next to the stretcher. Something was going on with Julia in that room, on that floor. But it looked like Fernita Wynn had it covered. I didn't know if paramedics were in the room with Julia or not but hoped that everything was okay in there. As I continued to walk by, wondering if I should poke my head in, I saw that suddenly Julia who was lying flat on the floor quickly arose to her feet, making it look like nothing was wrong with her. In reply to my seeing Julia so swiftly rise to her feet I decided that I'd continue walking on to grab the elevator and I went to get lunch.

#36. To this day, on December 8, 2015, I continue to ask myself, "Was the stretcher just outside of our 6<sup>th</sup> floor conference room on June 23, 2010 a prop? Was Julia really needing a stretcher that day? Or was this whole event staged? It sounds crazy that I would ask if this "Julia" stretcher event could have been staged to support Fernita Wynn's statement from Tuesday, June 22, 2010 to me that Julia was "too fragile" so "the company would probably not be terminating Julia's employment."

#37. The pages on the calendar quickly turned and Tuesday, July 6<sup>th</sup>, 2010 arrived. Just before 10:00am, on Tuesday July 6<sup>th</sup>, 2010, Fernita Wynn broke the news to me about Julia Rolle's death. It was the first day back in the office after the 4<sup>th</sup> of July holiday weekend. Paul McNamara and Chris Lemire still were in charge of our "Hollywood 411" show as I was solely discussing programming opportunities that I had for the show with Paul and Chris. When Fernita broke the news of Julia's death to me, Fernita told me that she obtained her information on Julia's death, a day earlier, on

#78



Monday, July 5<sup>th</sup>, 2010 from postings about Julia that Fernita saw on the social media website MySpace.com.

#38. But today, on December 8, 2015, as I write this complaint, I can say that my #1 Witness, named Michael Nalepa (our then Talent Booking Department Assistant) seems to have the most information about 'the death of 'Hollywood 411' Supervising Producer, Julia Rolle and how Julia, was monitored by TV Guide Network's satellite transponder the way that I have been monitored by it. Since July 13, 2013, Michael Nalepa has stated to me that quote-"Julia never knew exactly what hit her." Michael Nalepa can be asked to share more information with Lionsgate and with the Court about what he personally knows.

#39. Next, the days marched on and it became: Thursday, July 15, 2010. When this day arrived it was officially Matt Singerman's last day of employment. By the time July 15, 2010 showed its face on the calendar, Paul McNamara and Chris Lemire were in the process or had already started transitioning out of TV Guide Network, and the third member of their "Hollywood 411" managing producing team, the female supervising producer named Julia Rolle who became "deceased" just a little over a week earlier was gone. Kristan Giordano (Executive Producer of Specials for TV Guide Network was also going to be taking on Executive Producer duties for "Hollywood 411" as Paul McNamara's successor).

#40. Less than a week after saying goodbye to Matt Singerman, all of us at TV Guide Network found ourselves saying goodbye to Fernita Wynn (Senior Talent Booker).

#41. On Tuesday, July 20, 2010, our talent booking department had a Goodbye Lunch for Fernita. It was her last day. Fernita left us to accept a job with the Mo'Nique Show (the BET network's late night show that was produced out of Atlanta, Georgia). Attending Fernita's lunch that day were: Fernita Wynn, Lisa Germani, Michael Nalepa, and myself.

#42. Before the month of July 2010 marched into August, Kristan Giordano was in full swing as Executive Producer of our "Hollywood 411" show and for me it was business as usual in the TV Guide Network Talent Booking

#79



Department which now consisted of myself, Michael Nalepa and Lisa Germani.

#43. I was hitting home runs and delivering every wonderful booking and story opportunity that I possibly could deliver for TV Guide Network and I was never shy in reaching out to publicists and talent suppliers to try to secure pie-in-the-sky opportunities for us.

#44. As the month of August 2010 started, as stated above within Section Seven: My Title VII: Retaliation Chart, I once had a quick conference room meeting with Nancy Coleman (E.V.P., Human Resources, Lionsgate) about our office lighting. Nancy was also in charge of facilities. I needed further accommodation.

#45. This problem had happened once before, during Calendar year 2009. At that time, I moved from my 7<sup>th</sup> floor cubicle to a cubicle on our 6<sup>th</sup> floor and it helped a little, although I still needed to wear sunglasses in the office.

#46. But now again in August 2010, I needed further accommodation for my eyes, as the lighting just kept getting brighter and brighter. In addition to burning my eyes, our office lighting was also burning my skin. During our meeting, Nancy told me that she was working on this facilities issue for me. (All I needed was a desk in a darker space, even a desk in a small area of the office where the overhead fluorescent lighting could be turned off, I was an easy to please employee).

#47. As the month of August 2010 got further underway, I became a victim of a series of tort crimes and sexual assault & battery and sexual harassment crimes and my tortfeasors were my TV Guide Network co-workers, most of whom worked on our "Hollywood 411" show which Kristan Giordano had been the Executive Producer of for about a month's time (since mid-July 2010.)

#48. On the morning of August 16, 2010, my body was brutally raped with inability to leave for over 4 non-stop hours, starting at 1:39am until about 5:50am, when co-worker Michael Nalepa, using TV Guide Network's FCC licensed broadcasting operations machinery, including satellite transponder, intentionally planned, committed and carried out a violent "surprise rape" sexual assault and battery crime on my body.

# 80

#49. It was a pre-meditated “rape with a foreign object with my inability to leave” crime committed to hurt me and to cause me terror, pain, suffering, intentional infliction of emotional distress—but for what reason?

#49A. The foreign object that deeply penetrated my body to repeatedly gang-rape me and to have violent sex with my internal female sex organs was TV Guide Network’s satellite transponder, that Michael Nalepa had unusual access to. He was not FCC licensed, he was not a Tulsa, Oklahoma based broadcasting operations and engineering technician. Michael Nalepa at the time, for close to four years was a TV Guide Network Talent Booking Department co-worker of mine.

#49B. On August 16, 2010, for over 4 non-stop hours, Michael Nalepa had no regard for the levels of terror, fear, pain and suffering and distress that he personally elected to put me through while he was raping me. The levels of pain and suffering and bodily hurt from the force of this crime could have killed me. Michael Nalepa’s attack on my body this night was so severe that my body lost incredible amounts of water and fluids and my body did not heal for weeks following this disgusting “interactive human game” accomplished through the use of satellite transponder.

#50. How does Jack Carey (Senior Vice President of Operations, TV Guide Network) explain to me and how does Lisa Germani, who was Michael Nalepa’s direct supervisor at this time, explain to me, why Michael Nalepa was allowed to remain a Lionsgate employee for over 4 more months during 2010 when he committed such a disgusting, violent, barbaric and criminal act like this on me, using TV Guide Network’s owned and leased broadcasting machinery?

#50A. And how does Jack Carey and Lisa Germani and Michael Nalepa explain how Michael was able to have continued satellite transponder access throughout the remainder of his employment where he was allowed to brutally taser my genitals and breasts repeatedly throughout Fall 2010? This era of taserings finally stopped during mid-November 2010 but a whole new era of Michael Nalepa began on October 16, 2012 which so far has lasted up to today’s date of December 8, 2015.

#50B. Today, on December 8, 2015, how does Lionsgate’s Compliance Officer Richard Prell, as well as Jack Carey, as well as David Mandell (COO, POP TV) explain to me how it’s 5 years and almost 4 months later

#81

since I was savagely raped by Michael Nalepa on that early morning of August 16, 2010, and instead of shutting down Michael Nalepa's access to satellites, despite all of my reports made to Lionsgate from October, 2010 to August, 2015, (which includes my reports of "live feeds" being made to Nancy Coleman while I was still a company employee) that Lionsgate's Officers continue to allow Michael Nalepa, who hasn't worked at the company for just under FIVE YEARS, his continued access to TV Guide Network (now POP TV's) satellite transponder where even as I am writing this paragraph, Michael Nalepa is broadcasting his voice and he is zapping my foot with energy from the satellite transponder, trying to hurt my foot (because I am writing this).

#50C. How does David Mandell and Jack Carey and Michael Nalepa explain to me why on October 14, 2014, Mr. Nalepa brutally barbecued my body shortly after 3:00am Eastern Time Zone?

#50D. How does David Mandell and Jack Carey explain to me that when Michael Nalepa during the early morning hours of November 14, 2014 did a follow-up mini-barbecue event where he again brutally barbecued an area of my body during the middle of the night, that they still allowed Mr. Nalepa his access to TV Guide Network (now POP TV's) satellite transponder and less than 4 days later, David Mandell would send a letter to the FCC to "effective immediately" cancel TVGN's FCC License? I, as the plaintiff feel that David Mandell and Jack Carey both need to be interviewed in a deposition where they are both put under oath.

#50E. Michael Nalepa (remains my #1 witness but it seems that David Mandell, Jack Carey and Richard Prell have emerged and taken the crown as my #1 tortfeasors, replacing Michael Nalepa and replacing Lisa Germani). David Mandell (COO, POP TV), Jack Carey (SVP, Operations, POP TV) and Richard Prell (Compliance Officer, Lionsgate) at this point in time, not only have to explain to me, but also should be ordered to explain to the FCC, to Jon Feltheimer, to Leslie Moonves, and to the Court, exactly what is going on and what has been going on with former and current employees of TV Guide Network (now POP TV) retaining access to the satellite transponder for the sole purpose of committing unconscionable torts, that can only be achieved through their usage of a satellite transponder?

#82



#50F. Michael Nalepa personally owes me, Lionsgate, the FCC and the Court explanations that will be hard truths for him to tell about how he was able to set up his broadcasting technology rape crime in August 2010 as well as all of his follow-up crimes against me including assaults and batteries of my body that have taken place from November 2012 through today, December 8, 2015, where he keeps using what he says is the actual TV Guide Network satellite transponder, that broadcasts TV Guide Network's shows (now POP TV's slate of shows) into over 81 million viewers' homes.

#50G. Jack Carey (SVP, Operations for TV Guide Network (now POP TV) also allegedly, personally has some hard truths to tell to Lionsgate and to us all, including truths that will be hard for Jack to tell to Mr. Eugene Rolle (the father of Julia Rolle). Eugene "Gene" Rolle currently resides in Rancho Palos Verdes, California.

#51. Michael Nalepa, to his credit, himself admitted to me on July 13, 2013 via his satellite broadcast that day, that he was the rapist who committed the act on me that took place on August 16, 2010. Also on this day was when Michael Nalepa, to his credit, honestly revealed to me, without sharing all details, that Julia Rolle was killed by TV Guide Network's broadcast to her body, that July 4<sup>th</sup> Weekend of 2010.

#51A. Michael Nalepa is one of the most honest persons who I have ever met in my lifetime. In May 2013, I had hoped that Lionsgate's Richard Prell would make Michael a paid informant for Lionsgate. To this day, Michael Nalepa has the most information about why my co-workers in their August 2010 satellite broadcasts to me said that my rape was some sort of Jewish religion ceremony that co-workers gathered in TV Guide Network's Hollywood & Highland based studio for.

#52. On their late August broadcasts to me, my co-workers said that my rape was a staff event that was hosted in TV Guide Network's studio by Mark Istook (Correspondent) and that Scott Woodward (EVP of Programming and Production) delivered a "Baruch Atah" prayer while

#83



wearing a Jewish Tallit, just before I was brutally raped for 4-plus non-stop hours.

#52A. Today as I report this fact in my complaint, I don't really believe that my co-workers gathered in TV Guide Network's studio to celebrate my rape in some sort of crazy religious ceremony, but I was indeed raped, and just the fact that my co-workers would even broadcast fake information to me about a religious ceremony being held that co-workers convened for, shows all reading this document just a layer of what I endured while I was still employed as Senior Story Editor for Lionsgate's TV Guide Network.

#53. As I look back on my co-workers 24/7 broadcasts to me of 2010, there were many outlandish religious comments and sexual lewd remarks made during their broadcasts.

#54. Please also note that my #1 Witness, Michael Nalepa can detail for Lionsgate and for the Court how co-workers were able to give me the man-made, co-worker created eye disability achieved by turning up certain reflection and color levels and temperatures of their "always on" privacy rights invasion satellite that was electronically monitoring me 24/7, 365 days a year during 2010, 2009, 2008....and yes even further back than this, allegedly even when Rupert Murdoch's News Corp. managed and owned 41% of TV Guide Network.

#55. From 2010 through the present, my co-workers have termed the "always on" satellite as Brain-Hacking because through the use of TV Guide Network's broadcasting machinery, my co-workers are able to "live" record and in real-time view, every unspoken thought in my head as well as every spoken word that I utter in the course of each day as I live my life.

#56. My #1 Witness, Michael Nalepa can explain and inform Lionsgate and the Court about the technical architecture of brain-hacking, which exact Lionsgate owned and leased TV Guide Network broadcasting machinery is used to commit such torts, as well as which TV Guide Network management executives knew about and condoned employee misuses of the network's FCC license and machinery. Michael Nalepa can also discuss the names of the co-workers from Kristan Giordano's "Hollywood 411" and "Specials" departments who were involved.

#84

#57. Let's now get back to Discrimination, Retaliation and how on Friday, October 15, 2010, Nancy Coleman (EVP of Human Resources, Lionsgate) and Lisa Germani (Director, Talent Department) violated my Title VII rights.

#58. On Thursday night, September 30, 2010, My co-workers mostly from our "Hollywood 411" show had started revealing on their satellite broadcasts to me that it was Lisa Germani who was the kingpin behind the on-going campaign to mess up my life. At this same time my co-workers (some who tried to "mask" their voices while they were broadcasting) also revealed to me that they were doing their broadcasts because they were players in TV Guide Network's "David Geffen Will Game." If you are reading this document at this juncture you are probably saying to yourself what I said to myself---**SAY WHAT ?**

#59. The way they told it to me, my co-workers somehow thought that Hollywood's #1 citizen David Geffen was going to leave me money someday in his "Last Will and Testament" and my co-workers were hoping that if they did a good job with these broadcasts where they totally messed up my life that they could somehow transfer any future possible inheritance that David Geffen would possibly be leaving to me to themselves and to co-worker Lisa Germani.

#60. My #1 Witness Michael Nalepa can provide details to Lionsgate and to the Court about TV Guide Network's "David Geffen Will Game." Also- Michael Nalepa can provide details about my next-door neighbor Lynda Noiseux and other neighbors who were placed? Or hired? Or used? in the apartment building where I lived, known as: Doheny Drive Apartments to assist my co-workers in their identity transfer campaign where they'd somehow do an identity transfer making Lisa Germani, the longtime resident of my apartment at 1015 N. Doheny Drive, #1, West Hollywood, CA 90069, rather than me. Again- Michael Nalepa knows all of these details.

#85

More Information about Doheny Drive Apartments

#61. Doheny Drive Apartments is owned by Sunny Sassoon. Sunny is famous in his other business. He is the Executive Chairman of The Coffee Bean & Tea Leaf Company.

#62. I had lived in my apartment since early November 1986, even prior to Sunny Sassoon owning the building.

#63. Allegedly during the year 2006 one of my TV Guide Network co-workers, through Victor Reyes (Title: Resident Manager of Doheny Drive Apartments) secured a key and access to the apartment above mine. This access to that apartment resulted in my co-workers putting me through a night of sheer terror in October 2006. Earlier that month my co-workers produced a 'sex night' in the apartment above mine that was 'very left-of-center' specifically to invade my at-home solitude.

#64. Other interactions that one of my TV Guide Network co-workers allegedly had with Victor Reyes, Resident Manager of Doheny Drive Apartments includes doing what that co-worker could do to try to get me evicted from my apartment so that this co-worker or someone else under TV Guide Network's control (possibly even next-door neighbor Lynda Noiseux) could move into my apartment instead of me—all for my co-workers 'David Geffen Will Game' project.

#65. When Victor Reyes allegedly started playing along with one of my co-workers, there were plumbing bills falsely created (for a running toilet and for water that my toilet didn't use) by TV Guide Network's interference with management of Doheny Drive Apartments. I had to pay the false plumbing bills for excess water usage in order to keep my tenancy. When I did the math, the bills (from Tracy Taylor, Property Manager for Coffee Bean & Tea Leaf and also for Doheny Drive Apartments) said that my toilet gobbled down 100 gallons of water per hour! (It was impossible and false)—yet I had to pay these bills that amounted to about \$5,000 or face eviction. I also had lawyer costs and my co-worker allegedly teaming up with management of Doheny Drive Apartments put me through so much needless emotional distress.

#66. In August 2010 my next-door neighbor Lynda P. Noiseux was working with my co-workers to broadcast to me via the "always on" satellite that was

#86



allegedly being powered by the same broadcasting operations machinery that was daily broadcasting TV Guide Network's programming to our 81 million viewers' households.

#67. Lynda Noiseux who had two years earlier worked for Ticketmaster, the ticketing and marketing company, had several broadcasting shifts and Lynda was also playing along in instilling terror to me.

#68. By October 2010, Lynda P. Noiseux was also mentioning Lisa Germani's name in her broadcasts and Lynda was saying all kinds of crazy things like "Lisa Germani wanted Tricia Daniels to get ovarian cancer, to get breast cancer, to get brain cancer and to be beheaded!" Once out of nowhere, Lynda broadcast that Lynda herself wanted me dead!

#69. Lynda's broadcasts to me while she was broadcasting with my TV Guide Network co-workers caused real life-threatening terror to me. Lynda's participation and scripts allegedly were designed by my some of my TV Guide Network co-workers to keep me on an intentional roller-coaster of terror.

#70. Lynda via the satellite broadcast said a few times that she wanted someone named "Mark" to break into my bedroom window (of Doheny Drive Apartments) and rape me in my sleep and then murder me.

#87

#71. Lynda moved out of Doheny Drive Apartments in December 2010 but here is a brief chart of nights that I had to run away from home and stay in



a hotel as far away from home as possible because of terror that Lynda and my co-workers were putting me through because they wanted to win their "David Geffen Will Game."

-----

#72. Chart of Nights That I Had To Run Away From Home:

<u>Date:</u>	<u>Name of Hotel</u>	<u>Cost:</u>
8/16/10	Motel 6	\$68.39
8/17/10	Motel 6	\$68.39
9/28/10	Hotel booked thru Expedia.com	\$69.27
10/2/10	Best Western Hotel	\$96.32
10/3/10	Best Western Hotel	\$96.32
10/15/10	Calimesa Hotel	\$66.00
10/16/10	Calimesa Hotel	\$66.00
10/31/10	Knights Inn	\$64.20
11/7/10	Hotel booked thru Expedia.com	\$49.13
11/8/10	Hotel booked thru Expedia.com	\$57.67
11/9/10	Hotel booked thru Expedia.com	\$63.72

And there were 4 other nights not included here that I had to flee my apartment and stay as far away as possible due to neighbor Lynda P. Noiseux who TV Guide Network co-workers were directing in "Interactive Human Games" against me.

#73. Around September 28, 2010, one night when I ran away from home to hide in a hotel in the valley to try to out-run the terror of being kidnapped by some of my co-workers and by a group of voices broadcasting to me that I didn't recognize, the voices that were broadcasting to me started referring to me as "Laura Nyro." Co-worker Lisa Germani was being referred to as "Malibu Beach Girl" and it was a night when I was being badly sexually harassed, assaulted and battered by many taserings in my female body parts. The taserings were delivered to my body by TV Guide Network's satellite transponder. On this night at the hotel in the valley the voices that were broadcasting to me stated that "Lisa Germani said that Laura Nyro will be dead by October 21, 2010"—but, my co-workers were referring to me, that I was going to be dead by October 21, 2010 while "Malibu Beach Girl" (Lisa Germani) was going to be the winner of their "David Geffen Will

#88

Game.” Other strange remarks that were broadcast included that Sandy Gallin had a \$50 million dollar bet on my death.

#74. Lynda P. Noiseux a few times during late August and September 2010 even recited a list of how many millions of dollars TV Guide Network staffers were going to receive when Lisa Germani (“Malibu Beach Girl”) became ‘David Geffen’s Secret Wife.’ (Anne Alderete- \$5 Million Dollars, Kristan Giordano-\$ 4 Million Dollars, Paul Adler- \$7 Million Dollars, Matt Singerman- \$3 Million Dollars, etc. etc. etc.). Matt Singerman didn’t even work at TV Guide Network anymore. Apparently, co-workers thought or were trying to manifest for themselves that David Geffen was leaving me....get ready for this one.....\$150 Million Dollars! And they with help from my next-door neighbor Lynda P. Noiseux and with help that using TV Guide Network’s broadcasting operations machinery and satellite transponder would provide to them, were trying to transfer ‘David Geffen Will’ money to Lisa Germani.

#75. My co-workers even cast and “played” a long-time friend of mine who lives in the 818 area code into their game. This friend was “played” in their storyline this way: In August 2010 my friend stood to win a potential \$3 Million Dollars because she signed up to play in a game. Within days her \$3 Million prize money had ballooned up to a potential \$30 Million Dollars. Her storyline got played out quickly. I am not going to name her name in this document. And allegedly one of my sister-in-law’s was “played.” Michael Nalepa has these details and I certainly remember the event with my sister-in-law quite well.

#76. I don’t know why in 2010, my co-workers (including Michael Nalepa) wouldn’t have been able to stand-up to Lisa Germani instructing her to STOP, and I can’t imagine that Kristan Giordano (then Executive Producer) of TV Guide Network’s “Hollywood 411” show had no idea that her staff of producers, including writers Amy Sweet and Laura Slobin, and freelance producer David Park had been working around the clock since August 24 or August 25, 2010, with Lynda P. Noiseux in scheduled shifts to broadcast satellite harassment and assault to me. Somehow, co-workers from our “Hollywood 411” show along with my apartment building neighbor had been ratified to commit this extreme activity on me.

#89

#77. Since late August 2010, when it began, I had been daily telling my co-workers to STOP! But by October 15, 2010, it became clear by their remarks and comments that they were broadcasting to me that the person who I would have to confront about getting it to stop was "Malibu Beach Girl" herself, Lisa Germani. (My co-workers and Lynda P. Noiseux constantly said on their "live feeds" satellite broadcasts to me that Lisa Germani was "Malibu Beach Girl".)

#78. During the last week of September 2010, I had been satellite kidnapped for 5 weeks. Things got so scary with the terror that my kidnappers were broadcasting to me that the first weekend of October 2010, I had to just run away from my satellite kidnappers so I used 80,000 Frequent Flier miles and flew to NYC on a Friday night red-eye for just the weekend. It was a necessity, I didn't want to use the 80,000 Frequent Flier miles but I needed to try to outrun my kidnappers and the sexual assault taserings that they were hitting my body with. The pain and suffering and fear of their next taserings kept me terrorized. Also-the possibility that "surprise rape" could return at any moment that could possibly last for hours was terrifying to me.

#79. While in New York the first weekend of October 2010, voices of some co-workers and some kidnappers did indeed keep me in a constant state of terror and TV Guide Network's satellite transponder repeatedly sexually tasered and assaulted my genitals. I was sexually tasered while I was at my parents Queens, NY apartment and also while I was at one of my brother's residences in Roslyn, NY where he had 3 young children. Additionally, when my brother who picked me up at JFK airport was driving his car, a disgusting and lewd sexual harassment "Interactive Human Game" was broadcast "live" to me while I was sitting in the front passenger seat and while my brother was driving. I heart palpitated as I prayed that my brother was not able to hear the intense sexual harassment that was being broadcast to me and I tried to talk louder as I spoke to my brother so I could perhaps cover up any trace of the disgusting sexual harassment that was being broadcast to me from TV Guide Network's Satellite Transponder.

#80. By Friday, October 15, 2015 when my co-workers identities who had been broadcasting to me became known to me, the "always on" "live"

#90



satellite broadcast just wouldn't end. As stated in my Retaliation Chart, my co-workers had started revealing that Lisa Germani was the kingpin who could get the satellite harassment and satellite broadcast to stop, so just before my lunch break, I peacefully confronted and stood up to Lisa Germani in her office to oppose her unlawful employment practice of satellite harassment/electronic monitoring of me by "live" always on, broadcast satellite. For slightly over two months' time, I had been brutally sexually assaulted and battered, falsely imprisoned, harassed, been a victim to privacy rights invasion, pre-meditated intentional infliction of emotional distress, terror, sexual harassment, religion harassment and more.

#81. I was the victim of someone's ultimate "I'm going to ruin your life, humiliate you, and get you to quit your job due to being mortally embarrassed while I cause you nightly sleep deprivation, immense inflictions of terror, emotional distress and pain and suffering campaign." It just wouldn't stop and I just needed it to end.

#82. So, before I went out to take my lunch break, I followed the rules as written in the official Lionsgate company sexual harassment pamphlet that every employee of TV Guide Network was given on February 6, 2009 during our 1:30pm New Hire-Benefits Meeting that Randy Young of Lionsgate's Human Resources Department hosted that was attended by me and more than 60 fellow employees. I peacefully went into Lisa's office and confronted her and told her to STOP!

#83. The instructions in the pamphlet told me-"When possible, confront the harasser and ask him/her to stop. The harasser may not realize the advances or behavior are offensive. When it is appropriate and sensible, you may want to tell the harasser the behavior or advances are unwelcome and must stop. Sometimes a simple confrontation will end the situation.

Background: During Randy Young's meeting, each of us were presented with a "Welcome to Lionsgate" folder that contained a lot of documents. One was a pamphlet titled "Sexual Harassment Hurts Everyone" that detailed how sexual harassment was prohibited by this company. The pamphlet outlined Lionsgate's sexual harassment policies, detailed State and Federal Law and gave reporting directions to employees as well as

#91



instructions. (I still have my "Welcome to Lionsgate" folder and I have my copy of this pamphlet.)

#84. On October 15, 2010, when I confronted Lisa Germani, I showed her how upset I was at her for what she had been putting me through. I told her to STOP! Then I went to get lunch.

#85. Just after lunch I had no idea that Lisa Germani and Michael Nalepa had been plotting about how to retaliate against me for standing up to Lisa. I detail more about the afternoon of October 15, 2010 earlier in this complaint. (See: Section Seven: My Title VII: Retaliation Chart).

#86. Around 5:15pm that day, I received a telephone call from Nancy Coleman (E.V.P. of Human Resources, Lionsgate). Nancy whose office was located in Santa Monica, CA had made a special journey over to our Hollywood offices on this late afternoon. Nancy wanted to meet with me in one of our conference rooms. I told Nancy that I'd be right there to meet with her. Nancy was Lionsgate's top Human Resources official.

#87. During our conference room meeting Nancy seemed scatterbrained and didn't fully verbalize at first why she summoned me. Nancy started asking me questions about some proactive reports that I recently made.

(a) One of those reports was that my company email account had been hacked. This was of concern to me because as a Lionsgate employee I dealt with a lot of confidential information. Another reason that this hacking was of concern to me is because of Lionsgate's "New Hire" form (the very same form that contains the JAMS Arbitration clause that I signed on February 6, 2009). All TV Guide Network employees when we became Lionsgate employees on February 6, 2009, needed to sign and date a clause within Lionsgate's "new hire" form that we understood Lionsgate's company computer policies.

(b) The other proactive report which I made concerned an open phone line or a problem that may have existed in TV Guide Network's telephone room which was stationed behind the wall of my cubicle. I was hearing private telephone conversations that co-workers were having and I assumed that there may have been some possible wire

#92

damage or an open telephone line that needed fixing. I merely reported it so that it could be checked out. It turns out that the conversations that I was hearing were not coming from the telephone room, but they were coming from co-workers and were being broadcast to me via Lisa Germani's "Privacy Rights Invasion" satellite media tour, even while I worked in TV Guide Network's offices.

#88. Nancy Coleman next updated me on the office lighting accommodation that she was working on since the summer for me. Nancy said that she hoped to have this facilities issue solved soon for me.

#89. While I was sitting in this closed-door conference room on October 15, 2010, alone with Nancy Coleman, I answered her every question that I was asked. And then suddenly, Nancy did a 360 degree turn and opened her closed file. Nancy suddenly had become uncomfortable and her whole demeanor changed. Next, Nancy angrily asked me quote-"Did YOU SAY, DID YOU SAY...."

#90. Nancy kept stumbling on "Did You Say.....Did You Say...but Nancy would not complete her sentence. I had no idea what she was referring to at all. I insisted that Nancy talk to other employees to see what they'd be able to tell her. It seemed that Nancy was trying to accuse me of something but she would not verbalize exactly what I was being accused of by her.

#91. I peacefully and respectfully stood my ground with Nancy as suddenly it seemed that our closed door meeting had turned into some sort of Human Resources discipline proceeding with me as Nancy Coleman's target. Again, I told Nancy to talk to other employees in our workplace.

#92. Immediately without any reasoning, Nancy decided to punish me. At the conclusion of our unscheduled meeting, Nancy ordered me to work from home beginning immediately and not to return to the office. Nancy's voice was now raised and Nancy also ordered me to "get a consultation"—although she did not even explain further about what type of consultation she wanted me to get.

#93

#93. Again, I peacefully and respectfully stood up with my words to Nancy and told her to talk to other employees. I had done nothing wrong. Other employees would have been able to back that up. Nancy did not care. She showed me that her mind was made up.

#94. At the conclusion of my meeting with Nancy Coleman, she ordered me to work from home starting immediately. Our meeting was then over. When I left the TV Guide Network Hollywood, California offices that day to begin my Nancy Coleman ordered "Lionsgate Work From Home" chapter, I had no idea that for the rest of my employment that I'd never get to return to our office, not even get to clean out personal items from my desk. Also- that day, I had no idea of the next chapters of discrimination, bias, and retaliation hula-hoops that Nancy Coleman was about to put me through.

#95. Nancy Coleman's bag of retaliation tricks against me were not justified. These included forced "leave of absence/forced work stoppage", two fitness-for-duty Doctor's appointments, career damage, humiliation then ultimately termination.

#96. When Nancy Coleman started her retaliation tactics against me, I was suddenly being treated differently than every other employee at TV Guide Network, and in a negative way where I was not allowed to report to the office, for anything, not even to pick up my mail. This hurt my future at Lionsgate. I was not invited to even attend the annual company holiday party, I was not allowed to attend staff meetings and I was not allowed to attend production meetings for specials and special projects that our network was producing. Nancy's removing me from the office took me away from any normal interaction that I used to have with our network's executive management team. I wasn't even allowed to come to the office to pick-up my company mail, nor did it get forwarded to me while I worked from home.

#97. On October 15, 2010, Nancy Coleman's conduct and the way she treated me would have dissuaded any reasonable co-worker like Michael Nalepa, Heather Case, Amy Sweet, David Anderson, Laura Slobin, etc. from making or supporting my statements about the wrong-doing that was taking place at TV Guide Network due to Lisa Germani's discrimination of Tricia Daniels and due to Lisa Germani's privacy rights invasion electronic monitoring of me achieved through broadcast satellite.

#94



#98. We had a workplace that was out of control with staffers and freelancers, mostly from our "Hollywood 411" show working in shifts around the clock 24/7, daily to broadcast to me and I assert that when my co-workers saw that Lisa Germani could make up a false malicious sexual harassment charge about me, and when they saw that Nancy Coleman (EVP of Human Resources for Lionsgate) could instill an adverse employment action on me to punish me for something that I did not do, my co-workers were probably scared to speak up to Nancy to clear me and were probably scared to speak up to Lisa Germani because it would open a gateway for Nancy and Lisa to take adverse employment actions against them.

#99. Around August 3, 2015, I newly learned from my #1 witness, Michael Nalepa (our former TV Guide Network Talent Department Assistant) while I was writing up my JAMS Arbitration Demand the details of why Nancy Coleman threw me out of the office on October 15, 2010. Michael was broadcasting to me on the "always on" satellite broadcast and Michael who is the most honest person that you'll ever meet, revealed that Lisa Germani in an act of hostile behavior, with help from Michael, intentionally concocted and filed a phony malicious, "sexual harassment" report to Lionsgate's Human Resources Department against me. This phony report was filed by Lisa with Michael Nalepa's help an hour or two after I confronted Lisa and peacefully stood up to her in her office on Friday, October 15, 2010.

#100. Michael Nalepa revealed that on October 15, 2010, both he and Lisa together figured out that Lisa's ongoing satellite harassment campaign on me did not work out the way that they wanted it to and Lisa Germani and Michael Nalepa wanted my employment terminated immediately. They together created a phony sexual harassment charge in retaliation to me for standing up to Lisa where I told her to STOP IT! That afternoon, Lisa in an act of hostile retaliation set it up to intentionally ruin my Lionsgate employment and company benefits and to cause career damage and life damage to me.

#95



#101. Around August 3, 2015, Michael Nalepa also revealed to me that during my meeting with Nancy Coleman, the words that Nancy was not able to utter to me were quote- "Lick My Dick." Sadly, had Nancy said these words to me, and completed her sentence --"Did You Say... Lick My Dick?" I would have been able to tell Nancy that it was Lisa Germani who said those words loudly to Michael Nalepa, in our office hallway by Michael Nalepa's cubicle. I personally had witnessed Lisa loudly saying "Lick My Dick" to Michael who was an openly gay male employee. Lisa's words flew out of her mouth loudly so I am certain other staffers in our area heard this as well.

#102. Starting immediately on October 15, 2010, after the conclusion of my 5:15pm meeting with Nancy Coleman, I started working from home. And although the tort crimes (satellite harassments, taserings of my genitals, sleep deprivation and more) continued from my "Hollywood 411" co-workers via the "always on" satellite broadcast, I never let it get in the way of doing my work for the company. Case in point- I booked and set-up 86 (eighty-six) different interview bookings and production shoots that took place from October 16, 2010 through December 13, 2010.

#103. The next act of retaliation from Nancy Coleman arrived on November 30, 2010 when I was put on a work stoppage and the work stoppage action was career damaging and harmful to me as my business contacts could not reach me to complete bookings, could not reach me to coordinate news items for our "Hollywood 411" show, could not reach me to discuss future bookings, specials and other business for TV Guide Network. Suddenly, in the eyes of my business contacts, I was previously a responsible person and now it was like I had disappeared purposely leaving tons of unfinished business hanging.

#104. The forced "work stoppage" and "leave of absence" actions of Nancy Coleman's have caused me significant damage in my career as a talent booker. Now, its 5 years later and I have not recovered from the level of damage caused to me because of my employment with Lionsgate.

#105. On November 30, 2010 when Nancy Coleman's forced "work stoppage/leave of absence" new act of retaliation hit, it was a new discrimination and adverse employment action taken against me.

#96

#106. During November 2010, daily, I was hopeful that Nancy Coleman would allow me to come back to work in TV Guide Network's Hollywood office rather than keep me working from home. And throughout November 2010, at times the interactive human games being played by my co-workers via their broadcasts on the "always on" satellite had gotten so crazy that I started making some email reports to Nancy Coleman and to others at the company, about the "Live Feeds" that I was experiencing that were still being manned 24/7, daily by my TV Guide Network co-workers.

#107. Here are more details on what happened on November 30, 2010:

Details: On the afternoon of November 30, 2010, from out of nowhere a strange email from Nancy Coleman arrived to me while I was working from home. In her email Nancy put me on a 'Leave of Absence' and issued a work stoppage order to me. In her email Nancy stated that I needed to get a "Fitness-For-Duty" exam. I had just finished up details for my Johnny Depp/Angelina Jolie movie junket interview booking which was taking place in Paris, France. The interview would be promoting Depp and Jolie's new film "The Tourist" which was opening nationwide on December 10, 2010.

#108. In my email reply back to Nancy Coleman, I respectfully and politely stood up to her and I opposed this newest discrimination against me.

#109. After I sent my email back to Nancy where I refused to obey her "Leave of Absence" and "work stoppage order," because I believed that Nancy once again was discriminating and retaliating against me with this action, I also copied and forwarded Nancy's email along with my response to Lionsgate's Chief of Staff, named Heather Somaini and I cc'd Jon Feltheimer (Chief Executive Officer of Lionsgate.)

#97

#110. On Tuesday, November 30, 2010, Nancy put me on a four week leave where I'd be paid but where I wasn't allowed to perform any work for the company. Nancy made her reasoning for this clear in her email to me. Some of the words in Nancy's Tuesday, November 30, 2010 "work stoppage email" to me were:

-----  
Thanks for your email. We've checked with staff members and no one is aware of the various issues you identify below including the feeds you reference. Also, as many employees have mentioned to you, Hollywood 411 is not cancelled and is in budget through 2011. Several of your recent emails give us very significant concern.

As we discussed previously, it has been reported to us that there have been incidents at the office where you engaged in behavior that has frightened your coworkers and disrupted the workplace. Effectively immediately we are placing you on leave of absence and you are not to perform any work for TV Guide. Before we can permit you to return to the office, we request that you take a fitness for duty examination to ensure that it is safe for you to return to the office. Please schedule your exam with Dr. David Zakin at 310-281-7028.

-----  
#111. Strangely, on November 30, 2010 when I received this "work stoppage/forced leave of absence" email from Nancy Coleman, I had not even seen my co-workers for weeks and I had not been allowed to even visit the office for weeks. Strangely, Nancy Coleman had outrageously forgotten that on October 15, 2010 she herself ordered me to work from home during our 5:15pm Conference Room meeting. I had been working from home since that meeting.

#112. On November 30, 2010 there would be no possible way that any of my actions could have frightened my office co-workers. Here again, it seemed to me that Nancy was again self-governing herself. It seemed that Nancy again was punishing me for Lisa Germani's October 15, 2010 very public sexual harassment "Lick My Dick" comment that Lisa (not myself) had made to Michael Nalepa in our 6<sup>th</sup> floor offices. When I received Nancy's 'work stoppage email' it was unfathomable to me.

#98



#113. Michael Nalepa during the first week of August, 2015, confirmed to me via the "always-on" satellite broadcast that the story behind Nancy's Coleman's November 30, 2010 "work stoppage email" to me is that Lisa Germani wanted my employment terminated. Michael Nalepa who himself had been ratified by Lisa Germani to reach out to Nancy Coleman via email posing as Lisa Germani, admits that he himself also wanted my employment terminated because "the live feeds" (aka-the "always on" satellite broadcast that started on either August 24, 2010 or on August 25, 2010) had not worked out that way that Lisa Germani and Michael Nalepa intended. Michael Nalepa (my #1 witness) can be asked to share more information on this with Lionsgate and with the Court.

#114. Michael Nalepa can also discuss a couple of other things that were going on at the time.

- a) Strangely, Kristan Giordano, then Executive Producer of TV Guide Network's "Hollywood 411" show, started not responding back to me via email or via telephone regarding if she wanted brand new movie junket one-on-one interviews with movie stars of some of the films that were opening in December 2010 and in January 2011.
- b) The list of names I'd be 99.9 per cent able to deliver for our "Hollywood 411" show included: Nicole Kidman (for her Lionsgate distributed film "Rabbit Hole" which was to open on December 17, 2010), Robert De Niro, Ben Stiller, Owen Wilson, and Jessica Alba (for their film "Little Fockers" which Universal was opening on December 22, 2010) and there were others.

#115. "Hollywood 411" was our network's "Entertainment Tonight" tent pole show. Why was Kristan Giordano (the show's executive producer) all out ignoring me? If TV Guide Network's "Hollywood 411" show was to be in production in mid-December 2010 and beyond then we'd need to crank-out new weekly one-hour episodes and of course we would absolutely need and cherish these movie star bookings that I could 99.9 per cent secure for us. All I needed were Kristan's "yes" or "no" answers.

#99



#116. On November 30, 2010, when answers still didn't arrived from Kristan regarding if we'd be in production or on holiday break from producing "Hollywood 411," during mid-December, I sent one or two emails to a co-worker where I inquired about the status of our "Hollywood 411" program.

#117. It made no sense that Kristan Giordano would not be jumping for joy that I could get these interviews for her.

#118. Michael Nalepa has since explained to me that he and Lisa Germani, purposely reached out to Nancy Coleman (EVP, Human Resources, Lionsgate) on November 30, 2010 because when I questioned about the status of our "Hollywood 411" show, they saw a new opportunity to file a phony complaint about me which they hoped would result in Nancy Coleman terminating my employment. Remember, I did nothing wrong. I'm telecommuting because of Nancy Coleman's October 15<sup>th</sup>, 2010 orders to me to work from home. It's more than a month later and I was not allowed to visit the office, not even allowed to receive workplace mail being sent to me, and in a breach of duty as an Executive Producer, Kristan Giordano was not giving me the answers that I needed, so daily, even from home, I could keep delivering success for Lionsgate and for TV Guide Network.

#119. Michael Nalepa can also explain the subject line of my email chain to Nancy which was-"Laura Nyro/Malibu Beach Girl/David Geffen's Will."

#120. I had been reporting "the always-on" satellite broadcast to Nancy Coleman for several days. My TV Guide Network co-workers were still broadcasting to me around the clock in teams. They were still playing their "David Geffen Will Game" and it seemed to me that someone was actually scheduling my co-worker's broadcasting shifts.

#121. On these broadcasts, I was referred to constantly by my co-workers as "Laura Nyro." Lisa Germani was referred to constantly by my co-workers on these broadcasts as "Malibu Beach Girl" and my co-workers were playing out their "David Geffen Will Game" because they thought that Hollywood's #1 citizen, David Geffen was going to leave me a large sum of money in his "Last Will & Testament" and Lisa Germani with help from Michael Nalepa, and my co-workers set out to destroy my life and to devise a way where they could somehow shift any inheritance that David Geffen would possibly leave me to themselves. (It was CRAZY!) Even my next-

door neighbor at Doheny Drive Apartments, Lynda P. Noiseux was working with my co-workers and she wanted to win. At times it seemed that Lynda wanted to replace Lisa Germani as TV Guide Network's choice in the role of "Malibu Beach Girl."

#122. Here is some more information about the "always on" live two-way satellite broadcast that co-workers from TV Guide Network's "Hollywood 411" show, executive produced by Kristan Giordano, kept on me.

- a) I was having real-time live discussions with my co-workers via satellite every place I went. While I was at home during my personal off-the-clock, unpaid time, while I was in the shower, while I was having dinner with friends, while I slept, while I was on a Delta airplane flying from Los Angeles to New York, then while I was in New York, and then when I was on a Delta airplane flying from New York back to Los Angeles. Everyplace to anyplace I went, even when I was driving my car, TV Guide Network's live "always on" two-way satellite manned by my co-workers stayed with me.
- b) Remember the 1998 film "The Truman Show" starring Jim Carrey, which was about a live broadcast of the character Truman's every move captured by hidden cameras? Well, thanks to my co-workers and their company condoned misuse of TV Guide Network's FCC License, and broadcast operations machinery, I had become a real-life 'Truman Show.' But the one big difference is that instead of using hidden cameras to monitor my life, such as in the Jim Carrey movie, my co-workers instead used a ground-breaking, headline-making satellite transponder and transponder beam hook-up to listen-in "live" to my life, live my life with me, and allegedly to brain-hack me where they recorded every thought, every unspoken word, every uncompleted sentence, every memory in my brain.

#101

#123. Science and Technology have come a long way since the 1998 film "The Truman Show" and daily new marvels of technology continue to astound us and what my co-workers did to me is just that—It's Astounding! Who could ever imagine that a C-Band broadcast satellite, complete with 6-steerable spot beams, the very assets that TV Guide Network used around the clock to broadcast our network into viewers homes, could allow a group of my co-workers to satellite monitor and satellite tag-along in my life, 24/7, everywhere and anywhere I'd go.

#124. Even worse than the 24/7 monitoring, the live information that was being broadcast to my co-workers allowed some of them to play "Live" interactive human games with my life.

#125. The 4-hour rape with inability to leave crime that I went through on August 16, 2010 was not the first time that TV Guide Network's satellite transponder and broadcast machinery was rigged up to terrorize me and put me in a situation where I had inability to leave.

(a) On the night of October 26, 2006, I was put through a night of sheer terror by co-workers, when I was in my off-the-clock time, at home at Doheny Drive Apartments. On October 26, 2006, a group of my TV Guide Network co-workers were the perpetrators and producers of an "interactive human game" where they put me through sheer terror that lasted for hours that night, making me think that I was about to be murdered by gun-shot at any second, be it a gun-shot through the ceiling or through any of the windows of my apartment. This went on for hours. I was terrorized. I had to lay silently on the floor of my apartment without as much as the movement of a bone. If I would have risen and ran to my telephone to call the police my voice and movement from my running feet to get to my phone could have revealed my location where I was in my apartment, where those who were terrorizing me from the apartment above could have possibly shot me through the ceiling and murdered me; If I would have sneezed from the carpeting I could have been shot and murdered. The loud noises wouldn't stop! At one point my body went into shock.

(b) On Friday night, August 13, 2010, my TV Guide Network co-workers with assist from Lynda P. Noiseux played an "interactive human

# 102



game" on me. In this game I was sexually harassed and assaulted with a large amount of black powder which was rigged to fall all over me, to put me into a state of sheer terror during my personal off-the-clock time while I was at home in my West Hollywood apartment. When the mysterious black powder which was rigged to fall down all over my body succeeded, co-workers teased me and laughed at me via satellite trying to humiliate me "live" via the "always on" satellite broadcast. Being covered in the mysterious black powder was a scary thing. I had no idea if the substance was toxic, cancer-causing or what the powder was and the substance was expanding my body. My co-workers who were "live" on satellite that night called it "Pregnancy Dust" when they laughingly kept broadcasting words such as 'hahaha-she's pregnant.' Michael Nalepa, my #1 witness can explain the details of what happened this night to Lionsgate and to the Court.

#126. On Thursday, December 16, 2010, I called Nancy Coleman by telephone. Nancy was in her Lionsgate office and I was at home- still on her "work stoppage/leave of absence" orders. I was not allowed to do any work for Lionsgate until I visited with Dr. David Zakin to take a "Fitness-For-Duty" examination. The "always on" satellite broadcast was still on and there was so much work that I wanted to do. With 2011 just around the corner, complete with new films, with Awards Season Red Carpet Shows, complete with the January Television Critics Association's "TCA Press Tour" and more, there was so much to do. I had so much more success that I wanted to deliver immediately for TV Guide Network and Lionsgate.

#127. The evening before this day, On Wednesday, December 15, 2010, I was a guest at Ryan Kavanaugh and Tucker Tooley's Relativity Films Holiday Party. Only in Hollywood could it happen that here I am personally talking one on one and sharing in the holiday celebration with Ryan Kavanaugh who had so many 2011 and beyond films and projects on his production slate---and I want to book the stars of his upcoming slate of motion pictures and television productions for interviews and feature stories that could air on Lionsgate's TV Guide Network. Yet- I am on Nancy Coleman's personally ordered "Work Stoppage/Leave of Absence" and I am not able to initiate any booking business at this party with Ryan, Tucker and their Publicity and Marketing Executives who were in attendance too.

# 103



#128. Let's go back to Thursday, December 16, 2010, the morning after Ryan Kavanaugh and Tucker Tooley's Party. On this morning, during two different telephone calls with Nancy, I respectfully and politely insisted to Nancy that I needed to come over to meet with her in her office. (I made the calls from my West Hollywood apartment to Nancy who was at work in her Lionsgate-Santa Monica, CA office).

#129. I wanted a meeting that day with Nancy so she could see that I was "fit-for-duty," I wanted Nancy to drop her "Fitness-For-Duty" exam requirements, I wanted Nancy to see that she is still punishing me who does not deserve to be punished, I wanted for Nancy to restore my employment duties by ending her work stoppage, I wanted Nancy to restore me to TV Guide Network's offices, and I wanted to tell Nancy face-to-face more about the criminal activities that were still taking place at Lionsgate's TV Guide Network which still needed correcting. Criminal activities such as the "always on" satellite broadcast (also known as "The Live Feeds" and as "Lisa Germani's Satellite Media Tour.")

#130. During my two telephone calls with Nancy that morning, I respectfully stood my ground with Nancy and insisted she allow me to meet with her that day. I told Nancy that I wanted to 'name names' to her and sit with her and tell her details so she'd correct her discrimination of me and use the information to fix the illegal activities that were taking place at TV Guide Network. I also told Nancy that there was an event from October 2006 involving the same misuse of company technology by co-workers who were still my current co-workers that I wanted to discuss with her.

#131. I was also hoping this day to get the rest of Nancy's "Did You Say, Did You Say....." line from October 15, 2010. As stated above, I did not find out until on or about August 3<sup>rd</sup> 2015, from Michael Nalepa re: what Nancy's unutterable words were. Those words were Lisa Germani's "Lick My Dick" sexual harassment remark which Lisa made to Michael Nalepa, for all in the area of our 6<sup>th</sup> floor offices to hear.

#104

#132. Nancy Coleman, on this day refused to let me meet with her. She refused to meet with me for even a very short meeting. Nancy told me that she was getting ready to go on vacation and that she had no time to meet with me. Next, I pressed Nancy about meeting with her the following day, to which Nancy replied that she was only going to be working for a half day on December 17, 2010 as she was going on vacation and that she had no time to meet with me.

#133. Welcome to January 2011, Dr. David Zakin is on holiday, I'm still on work stoppage, and my co-workers in TV Guide Network's offices have denied me at-home access to my company email. Even though I was still obeying Nancy's work stoppage, I had no access to my company email account. My password had been changed. And when I sent an email from my personal Gmail account to my [tricia.daniels@tvguide.com](mailto:tricia.daniels@tvguide.com) address, I received back a pre-composed "Out of Office" email that was tethered to my company email account where anyone who emailed me any type of business correspondence got the following automatic reply sent back to their inbox as a response.

Quote-

"Thank you for your email. Tricia Daniels is not currently receiving e-mails at this address. If this is an urgent booking matter please reach out to one of the other staff members in the booking department.

That's all it said. Strangely, it was unsigned, there was no clue as to who wrote and initiated this, and there were no names or contact phone numbers for other staff members in our booking department who could be contacted instead of me.

#134. In early January 2011, Dr. David Zakin was still on vacation and I had to wait until January 21, 2011 to get onto his appointment calendar.

#135. On January 21, 2011, I went for a three hour fitness-for-duty exam with Dr. David Zakin that Nancy Coleman ordered me to go for and set-up for me and had Lionsgate pay for. I was still under work stoppage. It was a mental health exam that had two parts- a long oral interview where I sat

#105

face-to-face with Dr. Zakin and answered all of his questions. The second part was a multiple choice Q&A test that followed my face-to-face interview where I had answer over 630 questions.

#136. As I walked into Dr. Zakin's Brentwood, California office, it was already clear to me from my telephone conversations with Nancy Coleman that her goal was probably to try to have Dr. Zakin put me on some sort of disability. It was preposterous that Nancy would try to do this to me and it seemed unlawful to me that Nancy was trying to get me placed onto the California State Disability Benefit System as well as onto Lionsgate's Disability Insurance provider's systems until I'd possibly need to make an application for Social Security Disability. (All because Nancy was clearly favoring co-worker Lisa Germani and Lisa Germani allegedly did not want my Lionsgate employment to continue.)

#137. It was absurd to me that I, Tricia Daniels, a talent booking employee, who was a superstar at the company and one of broadcast journalism's well known and respected career talent bookers had to go through Nancy Coleman's retaliatory hoop of passing this fitness-for-duty exam. I wasn't a policeman who carried a gun, I wasn't a fireman who in the course of duty saves people's lives, I was a mere office worker who was being treated unfairly by Nancy Coleman because Nancy was clearly favoring co-worker Lisa Germani.

#138. As absurd and as embarrassing and humiliating as I found it to be, I recognized that I had to follow Nancy's orders and attend when my respectful attempts to get Nancy to change her mind about this just didn't work. Nancy just wouldn't budge.

#139. On January 21, 2011, the day that I went for my first three hour meeting with Dr. David Zakin in his Brentwood office, what was crazy to me was that a group of my TV Guide Network co-workers were there with me "live" via satellite due to the fact that TV Guide Network's "live feeds" to me were still taking place. That morning as I was talking live and in person to Dr. Zakin, my co-workers live witnessed this whole event "live" via satellite. I think it was as surprising to my co-workers that day as it was to me that Nancy Coleman senselessly was able to abuse her Human Resources power that Lionsgate entrusted her with, where she was able to do this injustice to me.

#106



#140. Perhaps this was just Nancy's way of wielding her own power? Nancy was the chief Human Resources Officer at Lionsgate who had held her position there for many years. Perhaps these intimidation techniques of Nancy's were well-honed and perfected by her through the years? Perhaps these intimidation techniques really worked for her and kept company employees threatened that if you stand up to Nancy Coleman, you could lose your employment, lose your company benefits, lose any chance of future promotion, and importantly, you could lose doing the work that you love. And as I was now learning firsthand, you could also possibly get ordered to go on some sort of phony mental health disability when you don't have any mental health issues at all, where you'd be taken off the regular company payroll, put on the rolls of Lionsgate's Disability vendor, and where the rug would be abruptly pulled out from your career and from your future at the company.

#141. At the conclusion of this first fitness-for-duty exam I knew that I exceeded Dr. David Zakin's expectations. He himself had told me that I was FIT-For-Duty, at the conclusion of our January 21, 2011 appointment. He even handed me his business card in case I knew of anyone who needed his services. Dr. Zakin that day was clearly looking for me to recommend some new clients to him, but he was not looking to have me as his client. I WAS FIT!

#142. Now, I must take a moment as I type this paragraph to send a shout-out to Dr. David Zakin, if he's reading this. Also, I'd like to take this opportunity to put in a commercial plug here for Dr. David Zakin. He was a wonderful person and as a Doctor, he is a leader in his field. If anyone ever asked me to recommend to them to a Los Angeles, California based Senior Psychologist, one who conducts medical and legal evaluations and provides psychological treatments, one who is just a wonderful professional, one who has a great sense of humor, one who is just the tops!, please call Dr. David Zakin and tell him that Tricia Daniels, formerly of Lionsgate recommended you. Dr. Zakin's telephone number is: 1-800-771-7955.

#143. Let's go to the week of January 24, 2011. A few days after my appointment when I didn't hear anything from Nancy Coleman. I was still on "work stoppage/leave of absence" from the company. Dr. Zakin had

#107



cleared me days earlier to return to the office. I was excited that I'd be able to resume my duties and return to the office and I called Nancy Coleman to check in with her. When I spoke to Nancy by phone she told me to enjoy my last few days of being away from the company because she was going to be returning me to the office, sometime next week.

#144. In that same telephone call, Nancy continued to tell me that there have been some changes at TV Guide Network, that Michael Nalepa from my department no longer works there, that we also have a new Executive Producer and it seemed that I was finally going to be unpunished and restored to my job.

#145. The next week came and the days started ticking by. I had not heard any new updates from Nancy so I telephoned her to check in. But the very next time that I spoke to Nancy by phone something had changed on her side. She instead wanted me to go back to Doctor David Zakin and get a second Fitness-For-Duty Exam. I later learned from co-workers that this was because Lisa Germani (Director of the Talent Department) did not want me back in the office. Lisa wanted my employment terminated. Here again, Nancy was newly discriminating against me and was favoring Lisa Germani over me. I could think of no business justification for this.

#146. By late January 2011, another crazy thing happened, without any notice to me whatsoever, my paychecks stopped arriving. Allegedly, a group of my co-worker tortfeasors took me off of Lionsgate's payroll. This group also removed my name and contact information from the company's master employee telephone list.

#147. I reached out to Nancy Coleman immediately about this for I was still a Lionsgate employee. I do have a very big compliment to make about Nancy Coleman, which is, that Nancy immediately got my 2 missing January paychecks cut and sent to me. I was supposed to receive these two paychecks during the previous couple of pay periods. On February 7, 2011, Nancy sent these paychecks to me at home, by UPS (United Parcel Service) next day air delivery.

#148. I went for my second Nancy Coleman ordered "Fitness-For-Duty" appointment on February 11, 2011 with Dr. David Zakin in his Brentwood, California office. And yes, my co-workers were there with me "live" via satellite due to TV Guide Network's "live feeds" always on broadcast to my

#108

body. At this juncture, my co-workers were calling the "live feeds" by a new name which was, "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." This second appointment with Dr. Zakin was a lot shorter in length than my first appointment had been. And just like my first "fitness-for-duty exam, taken just a few weeks earlier on January 21, 2011, the result was the same. Dr. David Zakin told me that he wanted me returned to the office by Nancy Coleman.

#149. During this second fitness-for-duty appointment with Dr. Zakin, on February 11, 2011, he seemed visibly upset at Nancy Coleman for sending me back to him a second time. I was mentally fit the first time and during my first visit, I was not a candidate for disability or for follow-up appointments or for anything. During my second visit to Dr. Zakin, he discussed with me his plan, which was, that he was going to instruct Nancy to leave me working at home for just two more weeks and then return me to the office. Dr. Zakin felt that there was nothing wrong with me and he felt that his plan would work with Nancy Coleman.

#150. I liked the fact that Dr. Zakin had a plan. I liked the fact that Dr. Zakin deemed me to be fit, so I kept my mouth closed to him that I was a prisoner of Nancy Coleman's ordered "work stoppage/leave of absence." Instead I kept my fingers crossed that Dr. Zakin would be able to move mountains with Nancy that would get me to be

- a) Returned to the office and
- b) That would get Nancy Coleman to nullify her work stoppage order.

#151. Stunningly, Nancy Coleman after this second appointment still would not return me to the office. Nancy kept me telecommuting from home. However, after this second appointment with Dr. Zakin, Nancy was forced to remove her work stoppage order and I was able to resume my talent booking duties for the company. (Nancy kept me on work stoppage from November 30, 2010 until mid-February 2011.)

#109

#152. But although Nancy in mid-February 2011 was lifting her 'work stoppage' order, there was a new punishment that Nancy issued to me. This new punishment to me was that Nancy suddenly made Lisa Germani, my former co-worker, into my new direct supervisor and into my only supervisor. According to Nancy, I was not to report to anyone other than Lisa Germani.

#153. Prior to this, Scott Woodward had been my direct supervisor. And in early 2010, Paul Adler instead of Scott gave me my annual performance review. Scott from 2005 through 2009 had always been in charge of my annual review. And all of my annual performance reviews were always glowing. I delivered for the company, I over delivered for the company, I loved the company and every year during my annual performance review it was made clear to me by Scott Woodward (from 2005 through 2009) and made clear to me by Paul Adler in 2010 how very valued I was at the company.

#154. In February 2011, it was unfathomable to me that Nancy Coleman would make Lisa Germani my supervisor. Lisa Germani was the one who started all of the retaliation trouble for me with Nancy Coleman back on October 15, 2010.

#155. When Lisa Germani became my supervisor: I still was not allowed to visit the office at all. I was not allowed to meet the new younger group of female employees who had joined our company in January and in February 2011 while I was on "work stoppage" when our company wanted TV Guide Network to appeal to a younger female audience.

#156. In January 2011 and in February 2011, not only did TV Guide Network's programming start to change but so did the ages and sexes of our employees. Gone from the regular payroll were the openly gay male employees (named: Michael Nalepa, and Tom McMahon). Even our openly gay male freelance producer (named David Park) was not getting hired with the regularity that he had been hired with, back during Calendar year 2010.

#157. It was clear to all of the network's employees that Lionsgate's TV Guide Network was attempting to grow younger and more appealing to women, not just in programming but also in style, graphics and in overall on-air attitude. Even the furniture and the set and the total on-air look and texture of our "Hollywood 411" show was changing drastically.

#110



#158. In late February 2011, in her role as my new direct supervisor, Lisa Germani told me repeatedly that our new female employees don't want to receive any phone calls, don't want to receive long emails or anything like that. Lisa instructed me to make all of my story pitches, run guest booking ideas, etc. through her. Daily, Lisa micro-managed my duties.

#159. Daily, Lisa kept reminding me not to call and not to send emails to our new group of female employees. Instead, I was to send all of my pitches, ideas and status reports directly to Lisa Germani and I would no longer be able to make my own judgements about what to reach out for. Lisa Germani was to make all judgement calls about my assignments, and Lisa Germani was to pitch all of my story ideas to producers and get their answers from them, instead of me. It was a 360 degree turn for me, who was used to pro-actively reaching out to a who's who of Entertainment Publicity and Marketing executives anytime I wished prior to Lisa becoming my direct supervisor. Lisa even created an "internal pitch list" email system that she would be the watcher and keeper of.

#160. In late February 2011, per Lisa, Lisa was creating a different plan for our network's film coverage with her boss and friend Paul Adler (V.P. of Programming and Production). By telephone, Lisa told me that I could still retain some film studios and some film centric area bookings but that I could no longer be the talent booker for the network who owned this entire area. I would now have to be one of several talent bookers working on our film coverage and that my talent booking duties would include more areas such as booking expert interviews for some upcoming specials the network was producing and booking stars of a new area that the network was starting to cover, which was Social Media.

#161. As the weeks from February 2011 turned into May 2011, Lisa Germani never revealed the new strategy for film coverage that she had still been working on directly with Paul Adler for our network. Lisa never had any updates about the new strategy or even when it was going to kick-in, even as we kept getting closer to the 2011 Summer Movie Season, the 2011 Cannes Film Festival, and 2011's San Diego Comic-Con.

#162. When Nancy Coleman (EVP of Human Resources, Lionsgate) made Lisa Germani my new direct supervisor, Nancy Coleman and Lisa together clearly prevented my future success at Lionsgate. It was like Nancy and

#111



Lisa had teamed up together to keep me down, to micromanage me, to discriminate and retaliate against me and to prevent me from having any relationships with co-workers, and to keep me isolated, working from home.

#163. In February 2011, just after my second visit to Dr. David Zakin, for Fitness-for-Duty appointment #2, when Nancy Coleman had to lift her "work stoppage" and "leave of absence" orders, in addition to making Lisa Germani my direct supervisor, Nancy Coleman also found a new way for retaliating and discriminating against me because Dr. David Zakin found me to be of sound mind and because Nancy didn't win in her attempt to get Dr. Zakin to put me on a mental health disability.

#164. In February 2011, Nancy's new way of getting even with me was to have a few telephone conversations with me where Nancy instructed me quote- "The Company wants you to take psychotropic drugs." Huh? That's not what Dr. David Zakin stated to me at all.

#165. In every telephone conversation that I had with Nancy from mid-February 2011 until the end of my employment at Lionsgate, Nancy kept telling me "the Company wants you to take psychotropic drugs." She also kept instructing me to go see a doctor who would prescribe psychotropic drugs to me.

#166. Nancy's repeated dialogue about psychotropic drugs was just crazy! I had never even heard the term "psychotropic drugs" ever before.

#167. As February 2011 turned into March 2011, Nancy still refused to return me to the office. She made me into a permanent telecommuter. During February 2011 and March 2011, I churned out as much work as I could possibly get Lisa Germani to approve for me to do. But on March 25 or March 26, 2011, a new crazy punishment would be slapped on me where I was not allowed to complete my job!

#168. The name and title of the person responsible for not allowing me to complete my job was: Heather Case (Senior Talent Booker, TV Guide Network's Talent Booking Department)

# 112

#169. Details: During the last week of March 2011, I booked LaToya Jackson and Star Jones to both join us for in-studio tapings on our "Hollywood 411" show. These were great bookings for us. And LaToya Jackson even pre-agreed to discuss her late brother, Michael Jackson with us on-air. Both LaToya and Star were going to be taping with us on the same afternoon.

#170. The day prior to LaToya and Star's in-studio interview tapings, in what seemed to me to be a malicious miscarriage of her authority or to be her own personal 'tip of a hat' to Lisa Germani, my talent booking department co-worker Heather Case, who also directly reported to Lisa informed me that I was not allowed to attend the in-studio tapings (for our "Hollywood 411" show) of these two A-List in-studio guests that I booked and did all of the taping logistics details for. --- HUH?

#171. Heather emailed me to say that she checked with Eileen Kohler of Lionsgate's Human Resources Department and that I am not allowed to attend these interview tapings because I 'needed to satisfy the requirements and orders issued to me by Lionsgate's Human Resources Department.'

#172. Heather Case was a co-worker of mine in TV Guide Network's Talent Department, not a personal friend of mine. Question-What information had Heather been privy to about the mistreatments and Human Resources on-going retaliations that I was being put through? I did not report to Heather Case in any way.

#173. I asked myself that day, was this a new retaliation, discrimination, belittling tactic or punishment issued to me from Heather Case? Or from Lisa Germani who possibly ratified Heather Case? It made no sense.

#174. Please note that at this juncture I was still not allowed to visit the office, not allowed to pick up my mail and that I had not been allowed back in the office at all since I got discriminated against, punished by, and thrown out of the office on October 15, 2010 by Nancy Coleman on a day when I peacefully stood up to Lisa Germani and told her to STOP IT!

#113

#175. During April 2011, I worked from home, I followed Lisa Germani's every direction and joyfully cranked out as much work as I could possibly be assigned by Lisa. I even began being successful at figuring out how to grab more and more work assignments out of Lisa. Even though I was working from home, my love of doing the job I did for Lionsgate was so apparent. I was proactive in suggesting story ideas, proactive in suggesting programming ideas for the network and I wanted so very much to keep delivering and over-delivering for the company.

#176. On May 4, 2011 my TV Guide Network Laptop had developed some issues and it became unusable. This was not the first time that this had happened with a Lionsgate issued laptop since I had been "telecommuting" from home. It had happened once prior, in November 2010, that my company issued Laptop developed a virus. That first time, in November 2010, Lionsgate's IT department sent a messenger with a replacement virus-free, diagnostically correct laptop to my West Hollywood apartment and I handed the messenger the bad laptop in exchange.

#177. When the morning of May 5, 2011 arrived. I was awaiting word from Walter Mayorga (Lionsgate's IT Department) and/or from Lisa Germani about my sick laptop. I wondered 'would I today be bringing my laptop over to the office, that I had not been allowed into by Nancy Coleman, since October 15, 2010, or, would Walter Mayorga and Ara Basil (from Lionsgate's IT Department) instead send a courier to my apartment to pick up my laptop from me, have it brought to TV Guide Network's Hollywood offices for a diagnostic look-see and clean-up, then once clean, the courier could bring the laptop back to me at my apartment in West Hollywood, where I could resume working from it?

#178. The Lionsgate company laptop that was assigned to me had developed something called a Windows RunDLL problem and I had VPN connection issues as well as an internal virus. I tried solving the issues on my own and was not able to clear up any one of them. It seemed that all of these issues working in concert together rendered the laptop unusable. I felt the issues were all standard usage issues and the issues could be easily solved by Lionsgate's IT professionals.

# 114



#179. While my laptop was sick, I continued to perform my work on my company issued blackberry as well as through our company issued webmail. However, the laptop was a necessary business tool that I needed in order to access our TV Guide Network Programming Shoots Calendar. Without access to this company portal I was not able to start and complete booking sheets, not able to issue updates, not even able to issue new information such as itineraries, celebrity interview times, travel directions and more into all of the upcoming bookings and shoots that I had secured and set-up for TV Guide Network to cover.

#180. As the morning of May 5, 2011 ticked on, no news came from Walter Mayorga, from Lisa Germani, or from Ara Basil about my laptop.

#181. It was Ara Basil who on May 4<sup>th</sup> informed me in an email that included Lisa and Walter that 'replacement laptops were hard to come by during that time frame. Ara instructed me to coordinate with Walter and Lisa to find the best time to bring my laptop over or to have it couriered over. I continued to work on my blackberry and through webmail where I was able to send out updates to bookings sheets and interview times that would suffice until my laptop got fixed, which would allow me to log into the bigger Programming Shoots portal.

#182. During late morning on May 5<sup>th</sup>, I received notice from Kara Howland, Assistant to Paul Adler that Paul wanted to have a telephone call meeting with me at 2:00pm sharp that day about futures. I was so excited. It would be the first time that I'd be conducting business with Paul since 2010 and I had so many ideas for one-hour movie specials that we could do and ideas for programming for the network. There were so many upcoming home runs that I wanted to hit for our network and this telephone call meeting with Paul, was an incredible opportunity to get "YES" answers.

#183. At about 2:00pm, Paul Adler (Title: VP of Programming) and Eileen Kohler (Human Resources, Lionsgate, who reported to Nancy Coleman) placed a joint telephone call to me where they jointly told me that my employment with Lionsgate will be ending. That my last day of employment would be two weeks later, on May 19, 2011. Paul immediately jumped off the line and left me to speak to Eileen who I had never had any contact with prior to this phone call.

#115



#184. What was supposed to be telephone call with Paul Adler to discuss future programming for the network somehow had turned into a termination call.

#185. After Paul jumped off the line once the bad news was delivered, Eileen Kohler remained on the line with me. During my conversation with Eileen there were no reasons given to me why I was being let-go. While we were on the phone together I respectfully and politely stood my ground and I sharply told Eileen that I am not supposed to be terminated and that there is a mistake and I want it to be immediately fixed. I peacefully demanded that Eileen have her boss, Nancy Coleman (EVP of Human Resources) call me back or have Scott Woodward call me back. (Scott's title was Executive Vice President of Production and Programming). Scott was my longtime boss from 2004 through October 15, 2010, but this all changed the day of October 15, 2010, when Nancy Coleman first chose to favor Lisa Germani and discriminate, retaliate and take an adverse employment action against me, by removing me from working in TV Guide Network's office.

#186. During my conversation with Eileen, I repeatedly told her that she and Paul Adler both did not have the authority to terminate my employment. I peacefully and respectfully stood-up to Eileen and held my ground that only Nancy Coleman or Scott Woodward would be able to terminate me. I also respectfully and firmly told Eileen that I had more than satisfied Nancy Coleman's two "Fitness-for-Duty" demands made on me just a few months earlier (in January 2011 and in February 2011) and I want to talk to someone higher-up about this. Eileen said that someone from the company would call me back. But as the minutes and hours went on, No one called me back from Lionsgate, not Eileen, not Nancy Coleman, not Scott Woodward, not Paul Adler, not even Lisa Germani to talk to me about my termination. Here my employment was being taken away without any explanation, and no reason was cited by Paul Adler and Eileen Kohler cited no reason.

#187. Almost instantly, when I hung up the telephone with Eileen Kohler, my Lionsgate company web-based email account and the email account that I had been able to access on my company blackberry were immediately viciously and maliciously turned off so I could not reach out to co-workers and management to protest my termination and so that I could

# 116

not complete my job duties for my final two weeks of employment at Lionsgate.

This was unacceptable to me. I had bookings to finish up details on.

#188. Some of the bookings that I was not able to finish up details on were:

Sat, May 7, 2011

International Movie Premiere Red Carpet at Disneyland for "Pirates of the Caribbean: On Stranger Tides"

Mon, May 9, 2011

Simply Shakespeare Fundraiser in Westwood (Tom Hanks, Rita Wilson, Martin Short, William Shatner, Eric Idle, Tim McGraw)

Mon, May 16, 2011

NBC-TV Upfronts Presentations in NYC - where we'd get quick on-camera interviews with stars of returning and new Fall NBC-TV series.

Tues, May 17, 2011

Paris Hilton- Oxygen TV's "The World According To Paris" Premiere Party shoot

Thurs, May 19, 2011

CW Upfronts Presentations in NYC -where we'd get quick on-camera interviews with stars of returning and new Fall CW Network series.

Sunday, May 22, 2011

Celebrity Apprentice Season Finale Red Carpet/Interview event – where we'd get quick on-site red carpet interviews with Donald Trump and the celebrities who starred on the show that season.

Saturday, June 4, 2011

Spike TV "Guys Choice Awards" Red Carpet.

#188A. The abrupt shutdown of my company email was another punishment which has caused career damage to me. The same career damage that was caused to me on November 30, 2010 when Nancy Coleman issued her "Work Stoppage/Leave of Absence" orders to me.

# 117

Now again, in early May 2011, I was suddenly unreachable to all of my contacts, unreachable to the Hollywood Publicists, Studio Marketing Executives, and movers and shakers who I dealt with. In an instant I was suddenly just gone from the company.

#189. Here, I was still a Lionsgate employee for two more weeks. My last day would be May 19<sup>th</sup> and I needed my email in order to be able to do and finish my work for the company. Without my email my business contacts were not able to contact me, my co-workers couldn't email me about projects that we were in the middle of working together on. I was immediately erased from the company although I still worked there for two more weeks. To my co-workers and to my business contacts this made me look irresponsible. Suddenly to the world, it looked like my employment had been abruptly terminated for misconduct or cause due to the way this was handled.

#190. I called Paul Adler on the telephone, reached him, to his credit, Paul picked up the phone and wasn't scared of speaking to me, an employee who just got termination notice. I respectfully begged Paul to get my email turned back on. It wasn't fair, I was still an employee who had two more weeks of work to do.

#191. On May 5, 2011, after the phone call about my email, Paul Adler never called me back with any updates on any efforts he made to get my email turned back on. And it seemed that he didn't care if my work got finished or not. Later that day, when I sent an email from my home email address to my Lionsgate email address, I received an automated email response back from Lionsgate's servers that had quickly been created, that was being sent to anyone who emailed my work address. This automated response email stated that Tricia Daniels no longer worked for the company and to please contact Lisa Germani (via Lisa's email) instead.

#192. The next day, on Friday, May 6, 2011, I tried a few more times to reach Paul Adler to try to get my email turned back on. Once, I even spoke to his assistant Kara Howland and respectfully begged her to find Paul because I needed my email turned back on for the remainder of my employment. Paul never called me back and Kara never called me back.

#118



#193. My email never got turned back on. I never even got to come back to the office to pack up personal items that remained in my workplace cubicle and desk which I had last seen on October 15, 2010.

#194. Sadly, to this day I have never recovered from the fact that I was not allowed to say "Goodbye" to my longtime co-workers and not allowed to tell my business contacts that my job was ending and refer them to another Talent Booker in our department who they'd be able to conduct business with starting on May 20, 2011.

#195. Michael Nalepa, my #1 witness has details about my termination and how it was a new retaliation and punishment to me.

Name and Titles of Person(s) Responsible for my termination: Lisa Germani (Director, Talent Department), Michael Nalepa (Former employee who no longer worked for the company but had access, permission, and who was ratified by Lisa Germani to use her email account) and Paul Adler (VP of Programming)

#196. Next up: Let's go to Date: May 19, 2011

Action: Falsified ADEA Termination Document

Name and Title of Person(s) Responsible: 1) Lionsgate's Human Resources Department. My termination package was sent to me by Patricia Ho from Lionsgate's Human Resources Department but I don't know who actually prepared my ADEA document. Note: I have heard that Lisa Germani (Director, Talent Department, TV Guide Network) emailed the list of who currently worked in her department to Human Resources.

#197. Details: It was my final day of employment with Lionsgate. My email was never restored on webmail or on blackberry. I was never allowed to complete any work since May 4<sup>th</sup>, no one from the company called me back not even Eileen Kohler and I was completely cut-off.

#198. This morning, I received a package from Lionsgate's Human Resources Department by UPS (United Parcel Service). It was an "employee termination packet." Included in my packet, was a one page black and white document that had the TV Guide Logo on top that someone printed from their computer. It was an official required ADEA (Age

#119



Discrimination In Employment) document that the company was required to include, perhaps due to Federal Law, and there were a couple of BIG problems with this ADEA required document.

#199. The Problems with the ADEA required document were:

Problem #1: I was over 50 years old and the document showed me that Lionsgate was favoring the company's younger employees by keeping them employed instead of me. Especially in my department, The Talent Booking Department.

Problem #2: The ADEA required document was not an accurate accounting of who actually worked in my department at TV Guide Network at that time. For instance in my department, a young twentysomething Talent Department Assistant (named Nell Lanman) was somehow completely left off of the document.

Problem #3: Lionsgate was terminating my employment but they chose to keep the employment in place of my 45 year old department co-worker. This 45 year old co-worker would have been named Fernita Wynn.

The very big problem here was that Fernita Wynn's employment at TV Guide Network had actually finished some 10 months earlier. Fernita's final day with Lionsgate took place on Tuesday, July 20, 2010 when Fernita resigned to take a job in a different company. Fernita left us to join BET's "Mo'Nique Show" which taped in Atlanta, Georgia. (And Fernita would have turned 46 by May 19, 2011 because her birthday occurs in mid-February!).

In May 2011, Nancy Coleman's Lionsgate Human Resources Department is terminating my employment with an official ADEA document sent to me and Lionsgate is keeping Fernita Wynn employed when Fernita doesn't even work there and had not worked there in just under 10 months! It made no sense! It was bad business and again it was just another cunning and skillful tool in Nancy Coleman and Lisa Germani's arsenal of retaliation and discrimination against me.

Problem #4: I know that Lionsgate is an "At-Will" employment company. But in both my termination packet and in the telephone call that took place to me in early May 2011 where Paul Adler (V.P of Programming) and Eileen Kohler of Lionsgate's Human Resources Department told me that I am being terminated, there was no other information given to me regarding

#120

the factors that the company used to pick me for termination. I was a shining star of the company, I was always thanked for all of the good work I did, I was always thanked for how much I cared about my work, I was thanked for always delivering, for constantly exceeding expectations. I was a doer! A difference maker! I over-delivered for the company each and every day. My termination made no sense! Why was I treated unequally with discrimination and retaliation and selected for layoff? Daily, I was one of the employees on the front line of the company delivering success!

#200. Let's move forward to fall 2012- I had not been a Lionsgate employee for almost a year and a half. The "always on" satellite broadcast still titled "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" was still on and by the end of October, the brightness of the satellite had been turned-up on me to a degree where I couldn't normally function. I was also getting assaulted and burned by the broadcasting operations machinery that was monitoring me. I had to contact Lionsgate. To make a long story short, Nancy Coleman was departing the company and Nancy referred me to Eileen Kohler and Brett Pugliese in Human Resources.

#201. When I reported to them that I had damages that were 100 per cent caused by my employment at Lionsgate's TV Guide Network, and when I asked if there was a company medical doctor that I could see, Eileen Kohler emailed me a "Worker's Compensation Form" that I filled out and mailed back to her. I was very grateful to Eileen for this. A few weeks later I needed to fill in and mail in a second "Worker's Compensation Form" when the "always on" satellite formerly known as "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" started burning my body, satellite slapping me, muscle bashing me and more.

#202. My Two Worker's Compensation Claim Numbers:

Claim #1: YMH91502C

Claim #2: YMH91711C

#203. Lindsay Bostrom, was the case manager at The Hartford Insurance Company, Lionsgate's Worker's Compensation Insurance vendor assigned to me. Lindsay herself never worked in TV broadcasting and was uneducated about workplace misuse of broadcasting technology,

# 121

specifically the misuse of satellite transponders, earth stations, transmitters, automatic antenna controllers, etc. and she and her team didn't want to investigate. (Side Note: Interestingly, Lindsay Bostrom's boss at The Hartford Insurance Company was also named Lindsay.)

#204. The non-investigation left the satellite situation in place over my body and the amount of wattage on me 24/7 was too high. In late November 2012, I filed my first worker's comp claim with Lionsgate's Human Resources Department which they sent to The Hartford. Soon after, I was interviewed by telephone by Lindsay Bostrom, the case manager and my interview was recorded. (I gave permission). Soon after, The Hartford sent me to two different Worker's Compensation medical doctor appointments.

#205. But, outrageously, The Hartford did not want to contact any one of the names of my former co-worker witnesses which I provided with witness telephone numbers. Lindsay Bostram, the Case Manager and her team did not want to do a workplace inspection and/or site visit investigation to TV Guide Network's Tulsa, Oklahoma based broadcasting facility. This was of no interest at all to The Hartford, or possibly The Hartford ran the idea by Lionsgate and Lionsgate turned it down.

#206. In December 2012, I was in very bad shape from the satellite monitoring surveillance situation that I remained imprisoned by so I mailed in my second Worker's Comp claim to Eileen Kohler in Lionsgate's Human Resources Department which was immediately turned over to The Hartford to handle. Again I was grateful to Eileen for trying to help me.

#207. The Hartford was still processing my first claim and The Hartford immediately turned this second Worker's Comp claim down. Their excuse was that I was no longer an employee of Lionsgate and that The Hartford had no proof as an insurance company of any science that would allow broadcast operations machinery (including earth stations and satellite beams from transponders) to broadcast direct to me. Again, The Hartford did not contact any of my former co-worker witnesses who were experts in this area. Again, there was no site visit to TV Guide Network's broadcasting facility in Tulsa, Oklahoma and the Case Manager at The Hartford (Lindsay Bostrom) who was clearly uneducated about broadcasting, did not even want to call any industry experts to learn more about broadcasting

# 122



operations machinery, satellites and the technical architecture that has ushered in an era of new risks to broadcasting companies like Lionsgate.

#208. A whole new era of employee negligence and employee misconduct has begun from new advances in broadcasting technology including advances in broadcasting operations machinery and satellites. The Hartford Insurance Company had no interest in this new area that they should have paid attention to. The Hartford could have been the leaders in this new area of workplace violence and workplace misconduct had The Hartford done a better investigative job on my Worker's Comp claims.

#209. As I have stated above, in my original telephone interview call (which was recorded) with Lindsay Bostrom, the Case Manager, I urged her to reach out to my former co-worker witnesses. Any one of whom could have personally explained how TV Guide Network's owned and leased broadcasting operations machinery was purposely rigged up to commit satellite assaults, privacy rights invasion and electronic monitoring of me.

Name and Title of Person(s) Responsible: Lindsay Bostrom, High Exposure Claim Consultant, The Hartford.com Contact info: Email: [Lindsay.Bostrom@TheHartford.com](mailto:Lindsay.Bostrom@TheHartford.com) Telephone #: 866-401-0222 ext. 2304199

#210. On either December 17 or on December 18, 2012, I called Jack Carey (Title: Senior Vice President of Operations, TV Guide Network) on the phone to tell Jack what I was experiencing.

#211. During the first quarter of 2013, I made a series of additional reports to Jack through email, snail mail and in spring 2013, I telephoned Jack again to see if there was anything that Jack could do to help me get the "always on" satellite which by then had become retitled to "Michael Nalepa's Satellite Broadcast" turned off. During our phone call Jack said to me quote- "it's not us, it's not us."

#123



#212. Now Let's Go to Early May, 2013

Details: I was getting burned, muscle based, satellite slapped, tasered and more by the "always on" satellite so I remembered that in Lionsgate's Employee Handbook, there was a company Compliance officer. So, I exercised my rights in a new act of "protected activity" and I typed up an official compliance complaint letter full of charges about company wrongdoings and rights violations that existed at Lionsgate's TV Guide Network. As a former employee I felt that I was still bound to follow the official company procedures set forth in the Lionsgate employee manual which instructed me to make a report to Richard Prell, Compliance Officer.

#213. In mid-May 2013, to follow-up my letter dated and sent on May 7, 2013, I made 4 different official telephone calls to Richard Prell to discuss the letter that he received from me.

#214. On my first call, I reached Richard. His response to me was that he had to quickly run off to attend a meeting and that he'd call me back. I waited and waited and he never called me back!

#215. I tried again to call him, and left a message reminding Richard that I needed to talk with him. As the days went by, after leaving a total of 3 different official telephone messages for Richard, he never called me back and he never wrote any response back to me.

#216. My official compliance letter and complaints to Richard Prell were met with no response.

a) I felt and still feel that Richard Prell intentionally chose to breach his duty to me, a former employee of the company.

b) I felt and still feel that Richard Prell breached his duty to Jon Feltheimer (CEO, Lionsgate) and to Lionsgate's executive team and

c) I felt and still feel that Richard Prell discriminated against me as a retaliation to me because in my official letter to him of May 7, 2013, I reported that Lionsgate was in non-compliance with Federal, State, Local and International Laws.

# 124

#217. When Jack Carey (Senior Vice President, Operations, TV Guide Network) said to me on the phone quote- "It's not us, it's not us," Jack was not under oath. Question- How does Jack Carey explain to Lionsgate, to the Court and to myself, the employee misuse of broadcasting operations machinery that has occurred at TV Guide Network which Jack allegedly in a breach-of-duty to Lionsgate and to me an employee/former employee of the company has condoned?

#218. Jack Carey and Richard Prell's non-help to me in 2013, caused post-employment damages to me by keeping me a prisoner of satellite assaults and battery, a prisoner of both new and continuing pain and suffering, a prisoner of lighting distress, and a prisoner of privacy rights invasion.

#219. For the rest of Calendar year 2013, former TV Guide Network co-worker Michael Nalepa and I remained connected 24/7, daily, via TV Guide Network's "Live" 2-way, always-on satellite. The broadcast once known as "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" had now taken on the new title of "Michael Nalepa's Satellite Broadcast." My #1 Witness, Michael Nalepa can discuss with Lionsgate and with the Court how he was allegedly given control of TV Guide Network's FCC Licensed Broadcast Satellite Transponder, and broadcast operations machinery, the same assets that are used to broadcast TV Guide Network, (now POP TV) to viewer's homes which have continued to broadcast to me.

#220. Let's now jump to:

Date: January 2014

Action: No Response to me!

Name and Title of Person(s) Responsible: Richard Prell, Compliance Officer, Lionsgate

Details:

In January 2014, I needed again to peacefully exercise my civil rights (not to mention Human Rights) with Lionsgate's Compliance Officer. I was still the post-employment victim of satellite assault and battery via the "always on" satellite broadcast. The Lionsgate Employee Manual has a policy that defines how complaints about criminal activities and wrongdoing at Lionsgate are supposed to be handled. Yet, despite all of my consistent

#125

January 2014 complaints, despite the frequency of my January 2014 complaints and despite the severity of my January 2014 complaints, I was just kept as a prisoner of the wrongdoing, so following Lionsgate's Employee Handbook that was issued to me on February 6, 2009, I again reached out to Richard Prell (Compliance Officer, Lionsgate) by mailing a new letter to Richard's office at Lionsgate headquarters in Santa Monica, California.

#221. Since December 25, 2013, I again was a victim of bad assaults and burnings, too many to list, but in January 2014, I tried to list them, when I made a series of reports to Ethicspoint.com. Ethicspoint.com is Lionsgate's official online compliance portal where I detailed criminal activities that were still taking place at Lionsgate's TV Guide Network.

#222. Let it be known that no one from Lionsgate or Ethicspoint.com, not even Richard Prell, responded to me. Again in January 2014, it seemed to me that Richard Prell was in intentional breach of his duties to me as a former employee of Lionsgate. Again, I felt totally discriminated against.

#223. The web address for Lionsgate's online compliance portal is:  
<https://secure.ethicspoint.com/domain/media/en/gui/5660/index.html>

#224. Prior to my use of the Ethicspoint.com online portal, I made a telephone call to Ethicspoint's toll free number to make a verbal report and the name of the intake manager who I spoke to was: Towanda. I made this oral report on Wednesday evening, December 25, 2013 (Christmas night) when my scalp got brutally burned from a blast that originated from TV Guide Network's "always on" satellite broadcast that had imprisoned me since 2010...2009...2008...2007...2006 and earlier.

#225. My #1 Witness, Michael Nalepa can explain what happened the night of December 25, 2013 to Lionsgate and to the Court.

# 126

#226. Here is a List of Ethicspoint.com online portal reports I made to report burnings, assaults and more that I was experiencing live. I prayed for relief from Richard Prell (Compliance Officer, Lionsgate) and/or from Ethicspoint (Lionsgate's Compliance Portal vendor) but no compliance relief, not even any follow-up contact back to me ever arrived.

Dates/times:

December 26, 2013 at 9:24pm

January 2, 2014 at 4:20am

January 4, 2014 at 2:00am

January 6, 2014 at 2:43am

January 6, 2014 at 6:50am

January 6, 2014 at 10:00pm

January 7, 2014 at 1:49am

January 8, 2014 at 11:32am

January 9, 2014 at 1:47am

January 9, 2014 at 1:07pm

January 10, 2014 at 7:09am

January 11, 2014 at 9:38pm

January 12, 2014 at 8:07am

January 15, 2014 at 6:35am

January 16, 2014 at 12:39am

January 16, 2014 at 10:43pm

January 17, 2014 at 2:19am

January 17, 2014 at 11:12am

January 17, 2014 at 11:55am

January 18, 2014 at 1:18am

January 19, 2014 at 7:10am

# 127



January 19, 2014 at 7:32am

January 20, 2014 at 12:09pm

January 21, 2014 at 12:41pm

January 22, 2014 at 7:46am

January 24, 2014 at 2:32am

January 25, 2014 at 4:26am

January 27, 2014 at 9:39am

January 28, 2014 at 12:29am

#227. Let's Jump to February 5, 2014: Please see Retaliation Act #7 in Section Seven of this document for the events of this day. On this day, Jack Carey (Senior Vice President of Operations, TV Guide Network) retaliated against me by having David Mandell send me a Cease & Desist email.

#228. David Mandell's title at the time was: General Counsel & Executive Vice President, TV Guide Network.

#229. Details: On Feb 5, 2014, David Mandell discriminated against me with his "Cease & Desist" email which immediately barred me from having any contact with current and former co-workers. I also felt that it barred me from having any further contact with Lionsgate's Human Resources Department, and from making any contact to Lionsgate's Executive Management including making any further attempts to contact Richard Prell (Lionsgate's Compliance Officer).

#230. David Mandell's "Cease & Desist" was a new intimidating retaliation action slapped down on me. One that immediately interfered with my prospects for new employment. I could not contact my former bosses and could not make contact with my former co-workers for references, to network or to spread the word that I was job hunting. This caused me economic damages, loss of career damages, social damages, emotional distress for fear I would accidentally come into contact with a current or

#128

former TV Guide Network or Lionsgate employee in a supermarket or at another public place.

#231. Even worse than all of that, I feel that David Mandell breached his duty to me a former employee of Lionsgate, just as Richard Prell (Lionsgate's Compliance Officer) had done. David Mandell instead of telephoning me to see what I could tell him where he could try to help rescue me from the misuse of TV Guide Network's broadcasting operations machinery, instead made his own personal choice to slap me with his "Cease & Desist" email, where he continued Lionsgate's systematic failure to cure wrongdoing at the company and discriminate and retaliate against me anew.

#232. Electronic monitoring of employees and of former employees is activity that is contrary to Federal, State, Civil Rights, FCC Rules and Regulations and U.S. employment laws. How is it possible that David Mandell is able to squash me and punish me and discriminate against me with his "Cease & Desist" email as a retaliatory action for complaints that I had newly made to Jack Carey (Senior Vice President of Operations for TV Guide Network)?

#233. From February 5, 2014 into March 2014 and into April 2014, I kept getting burned, satellite slapped, muscle bashed and tasered from TV Guide Network's "always on" satellite which kept Michael Nalepa and myself tethered together 24/7, by technology.

#234. In late April 2014, I had to just try to lift myself up out of and outrun the burnings. I moved to New York City from the West Hollywood Apartment that I lived in, loved and had been paying rent to live in for a little more than half my life. All because of the gross misconduct and retaliations of Lionsgate and TV Guide Network employees.

#235. Starting on April 26, 2014, I became a new resident of New York City (Queens County) and for the rest of April 2014, and for the entire months following, I was still getting burned, and bashed and at times satellite slapped from the "always on" satellite that allowed Michael Nalepa (my #1 Witness) to live my life with me, as I was living it. I started wondering if Human Rights groups such as Amnesty International had ever dealt with any Human Rights violations such as the ones that I am stating the facts about in this document. But I did not reach out to Amnesty International.

#129

#235A. Cut to October 14, 2014—sometime after 3:00am Eastern Time Zone, when I got barbecued (brutally barbecued) by TV Guide Network's technology. Michael Nalepa (my #1 witness) has the story about what happened that night. It was at that moment as I laid helpless, in Queens, New York after just being painfully barbecued with bone crushing force, fearing again for my continued safety, and for the continued safety of my family members who reside in New York City, when I decided that I needed to reach out to famed civil rights and civil liberties attorney, Norman Siegel.

#236. In my written correspondence to Mr. Siegel, I tried to retain him as my attorney, so that he could represent me in opening a dialogue with TV Guide Network. The "always on" satellite broadcast had become a Human Rights and Public Safety matter not to mention what I deemed as a continuing violation of the network's FCC license, I reported to Mr. Siegel some of the outrageous activities that I had experienced.

#237. Sadly, I was not able to secure Norman Siegel as my legal representative but I was still getting burned, bashed and tasered.

#238. On either November 12, 2014 or November 13, 2014, I decided to attend the 2014 Satellite and Communications Conference & Expo (known as "SATCON") at New York City's Jacob K. Javits Convention Center, to try to learn as much as I could about the technical architecture of how a satellite transponder, earth stations and broadcasting operations machinery could be connected to a person. I did learn a few pieces of information from a few chats that I had with Satellite Communications Executives who I was asking general questions of.

#239. One of the vendors who had one of the biggest and best booths at this industry mega-show was Intelsat, who according to my former co-workers is TV Guide Network's satellite transponder vendor.

#240. So, in a situation that could only happen to me, Tricia Daniels, it's November 12, 2014 or November 13, 2014 and I am visiting the Intelsat booth, at Satcon. I am picking up Intelsat's sales materials, briefly meeting some of their employees and TV Guide Network's "always on" satellite is there "live" with me. I and Michael Nalepa are having our usual 24/7 "live" 2-way conversation as I am standing in Intelsat's booth. Michael Nalepa is at home in North Hollywood, California and I am in midtown Manhattan.

# 130



#241. Tethered together either through the magic or the misuse of satellite communications, Michael and I were learning about Intelsat's newest offerings and undertakings such as video neighborhoods and we were learning more about Intelsat's superior reach, and about their weather resident C-Band fleet. I kept my mouth closed and did not say anything to Intelsat's employees about rain-fade or about my firsthand experiences. Nor did I say anything to other telecommunications vendors in attendance about the satellite violence that I had been encountering since August 2010 which I feel may be broadcasting from Intelsat's owned Galaxy 15 and/or Galaxy 12 C-Band satellites. But I did try to learn as much as I could from other vendors about automatic antenna controllers, fly-away portable earth stations, handheld transmitters, S-Band satellite, L-Band satellite and Ka-Band, which is the future of space communications.

#242. Even while we were attending Satcon 2014 together, Michael Nalepa still refused to tell me the technical architecture of how TV Guide Network's satellite transponder keeps the two of us tethered together but that day, for me it was incredible just being there, standing there at Intelsat's Booth, with Michael Nalepa tethered "live" to me via satellite. It was one of the craziest, unusual moments of the journey that we have taken together via TV Guide Network and vendor Intelsat's business relationship.

#243. During the early morning hours of Friday, November 14, 2014, a mini-reoccurrence of the event that I had suffered through exactly one month earlier took place during the middle of the night while I was lying in the safety of my bed. It was a mini-event because it did not last as long as the October 14, 2014 event, and the wattage and the wave of the blast across my body was more contained, but it was as burning and as painful and as bone crushing and as terrifying as the event of one month earlier. Again, someone was barbecuing me in my bed using TV Guide Network's and Intelsat's satellite transponder.

#244. Coincidentally, on Monday, November 17, 2014, David Mandell (General Counsel, TV Guide Network) sent an "effective immediately" letter to the FCC where he cancelled TV Guide Network's (TVGN's) FCC License and he included Jack Carey, SVP, Operations-TVGN as a cc: on the letter. The way that I found out about this is through Google. The FCC published David Mandell's "effective immediately license termination" letter on the internet.

#131



#245. TV Guide Network would not officially rebrand into POP TV until Mid-January 2015. The network still had 7 more weeks as TVGN before the rebrand would occur and allegedly TV Guide Network operated with a terminated FCC License unless David Mandell and Jack Carey decided that Les Moonves' CBS Corp. FCC licenses would cover TVGN and POP TV's FCC license requirements.

#246. Coincidentally, David Mandell's letter of "termination" to the FCC coincides with:

- a) The timeframe that I reached out and went "Civil Rights" attorney shopping. I really wanted well-known Attorney Norman Siegel to represent me but sadly I was not able to secure Norman Siegel as my representative.
- b) Coincides with my November 12 or November 13 visit to the SATCON event where Michael Nalepa was tethered to me via the "always on" broadcast satellite still being broadcast to my body.
- c) David Mandell's "termination" of TVGN's FCC license letter is dated November 17, 2014. That's less than 4 days later since the November 14, 2014 mini-occurrence of me getting re-barbecued in my bed.

#247. Today it's about 22 months later since I received David Mandell's "Cease & Desist" email of February 5, 2014. I am still barred from contacting current and former employees, including former bosses, some who are in new companies who possibly have the power to recommend me, and possibly hire me to perform Talent Booking services.

#248. Details: Between September 8-9, 2015, I was discriminated against anew by David Mandell (Title: Chief Operating Officer, POP TV, (formerly TV Guide Network) when he took the adverse action of denying me an employee benefit that I am signed for, which is, the benefit of Mandatory Final and Binding Arbitration (through JAMS ADR) with Lionsgate for any issue whatsoever that arose during our employment or after our employment.

#132

#249. I and all other employees of Lionsgate's TV Guide Network, (employees of all levels, employees of all positions) who chose to sign-up for this benefit on February 6, 2009, are signed to Arbitrate with Lionsgate through JAMS ADR-Not Sue! This is our official employee/former employee grievance procedure.

#250. I along with 60 (sixty) plus fellow employees signed our "new hire" paperwork, in the same conference room together, on February 6, 2009 before Randy Young of Lionsgate's Human Resources Department. Right after I signed my "new hire" and benefits paperwork I was a full employee of Lionsgate. I worked, I got paid, I received benefits, I worked, I got paid, and I received benefits, and this relationship continued for the remainder of my employment. In other words, I fulfilled my contract to Lionsgate and Lionsgate fulfilled its payment and benefits contract to me. One of the provisions and benefits of my employment with Lionsgate was the benefit of post-employment grievance resolution through JAMS Arbitration.

#251. David Mandell's new retaliatory action against me, taken on Sept 8-9, 2015, where he denied my contracted Jams Arbitration benefit, (a benefit of my past-employment with Lionsgate that lasts with me throughout my lifetime) is a malicious and terrorist act of hostile discrimination and intimidation and retaliation against me, because both during and after my Lionsgate employment, I made over 23 reports of company misconduct that to this day stands uncorrected. My newest and latest report of continued misconduct is contained within the pages of my August 2015 Jams Arbitration Demand which David Mandell received.

#252. By refusing my JAMS arbitration demand on Sept 8-9, 2015 David Mandell just continues his on-going retaliation of me! Every other employee who was in Randy Young's "Welcome to Lionsgate" meeting on February 6, 2009, who chose to sign and elect this company benefit is contracted to Arbitrate-Not Sue!

#253. Question: Why is David Mandell able to treat me less fairly?

#254. Question: Why is David Mandell able to invalidate and cancel and nullify an employee benefit of mine that I am signed to with Lionsgate?

#255. Question: Why is David Mandell committing his own on-going retaliation campaign against me?

#133

#256. By Mandell's denial of my protected and contracted benefit and right to JAMS Arbitration with Lionsgate, I allege that David Mandell is trying to entice me into sending him a protest letter about his denial of my arbitration rights, so that he in turn can go ahead and call any new contact from me where I once again stand up for my rights, what Mandell in his vocabulary, terms to be "business disruption." For if I create new "business disruption" for David Mandell, he can go forward with his threat to obtain an injunction against me where I would be 'gagged' and wouldn't be allowed to discuss the following things that I have lived through and experienced firsthand:

- a) TV Guide Network (now Pop TV's) unlawful misuse of their FCC License (a U.S. government broadcasting business license). No reasonable person would stay silent about the wrongdoing and public safety hazard that has been created by the misuse of TV Guide Network's broadcasting operations machinery.
- b) An injunction by David Mandell would be able to keep me quiet about what I've heard about the July 4, 2010 death of co-worker Julia Rolle (Title: Supervising Producer, TV Guide Network). According to former co-worker Michael Nalepa, who is my #1 witness, Julia, like me, had TV Guide Network's broadcast satellite transponder and operations machinery monitoring and surveilling her 24/7, 365 days a year.

Michael Nalepa has details that he has personally shared with me via the "always on" satellite about how Julia's life abruptly ended when she got killed by TV Guide Network's satellite technology that was assigned to surveille her. "Julia didn't even know what hit her" is what Michael Nalepa has told me repeatedly. Outrageously, Julia on July 4, 2010 didn't make it through.

- c) An injunction by David Mandell would be able to keep me quiet about TV Guide Network's "David Geffen Will Game." When a group of co-workers thought that Hollywood's #1 Citizen, David Geffen, was going to leave me a large sum of money in the future, through his 'Last Will and Testament, they created a "game" as described within the pages of this document.

#134



- d) An injunction by David Mandell would also be able to keep me quiet about respondeat superior liabilities, vicarious liabilities, qui facit per alium facit per se liabilities and about employer ratification liabilities that I have had to endure. Company management employees Jack Carey (Title: Senior Vice President of Operations, TV Guide Network,) Paul Adler (Title: Senior Vice President of Original Programming) and Kristan Giordano (Title: Vice President of Original Programming) have responsibilities to Lionsgate, have responsibilities to Lionsgate's stock holders, and have responsibilities to satellite vendors such as Intelsat and Encompass Digital Media to forbid the misuse of satellites. Jack, Paul, and Kristan are management employees whose scope of business it is to protect and supervise the use of broadcasting technology assets used by their staffs as well as freelancers. They are also charged with protecting employees.
- e) An injunction by David Mandell would also be able to keep me quiet about David Mandell's outrageous and negligent "Cease & Desist" "legal threat" that he created and chose to email to me on February 5, 2014. An injunction would silence me from discussing the document and/or showing this threatening document to anyone.

#257. David Mandell leaves me in a current state of post-employment retaliation where he has denied me economic recovery for damages to me that would not have occurred except for a systematic failure by Lionsgate's Officers (Nancy Coleman, Richard Prell, David Mandell, and Jack Carey) to investigate and cure negligence, criminal activities, respondeat superior liabilities, vicarious liabilities, qui facit per alium facit per se liabilities and employer ratification liabilities that I have had to endure.

#135



## **SECTION TEN: PRIVACY RIGHTS INVASION**

#258. Allegedly, some senior management executives of TV Guide Network knew about my co-workers' improper use of the satellite transponder, to monitor me and to monitor Julia Rolle.

#259. TV Guide Network (now POP TV) is a TV broadcasting company whose programming is delivered to viewers via satellite. During my employment, Lisa Germani, Michael Nalepa and others had full access to the satellite transponder as well as to an army full of Lionsgate owned and leased broadcasting machinery at their disposal to allegedly, illegally monitor anyone whom they targeted. (Michael Nalepa, my #1 Witness can share these details with Lionsgate and with the Court.)

#260. It is my personal opinion that instead of management taking my co-workers access to satellites away, that TV Guide Network's senior management executives were probably scared of disciplining, or scared of confronting, or scared of forcing employees to stop. It seems that for management of TV Guide Network, it was easier to allow my co-workers their continued access to the satellite transponder, then to risk drama in the workplace.

#261. Lisa Germani's alleged years of monitoring me via TV broadcast satellite is one thing- but when Lisa allegedly shared the knowledge she gained from the illegal monitoring of me with co-workers, I became one of the worst victims ever of privacy rights invasion. Daily, as I lived my life, TV Guide Network's satellite transponder allegedly beamed back every detail about my life and all details allegedly were recorded by closed-captioning machines and made accessible "live" to my co-workers. Including my beliefs, my memories, my bank passwords, my conversations with business associates, conversations with family members, with neighbors and more.

#262: It was unknown to me for years that every piece of information about me and my life (and in my head) were being recorded while I was living my life until my TV Guide Network co-workers started broadcasting direct to my body. This happened less than two months after Julia Rolle didn't make it through, on that July 4<sup>th</sup> Weekend of calendar year 2010.

# 136

#263: Allegedly, my co-workers were able attach and couple-up their satellite transponder set-up that had previously been used to surveille Julia Rolle, to the satellite transponder set-up that was already surveilling and monitoring me which doubled the wattage assigned to my body.

#264: This explains why during July 2010, my body's tolerance to lighting, especially fluorescents, car headlights, and store lighting got worse, because the manmade co-worker disability that previously existed from the single satellite transponder on me was suddenly doubled by the addition of the extra Julia Rolle surveillance set-up to the set-up already in place on me. Suddenly, the double set-up that was assigned to me, gave my co-workers extra broadcasting frequencies where they were now able to broadcast "live" to me in real time, 24/7 around the clock, through a full duplex telecommunications system, powered by TV Guide Network's satellite transponder and other broadcasting operations machinery.

#265. From Wikipedia.com: Full Duplex Communications System  
In a full duplex system, both parties can communicate with each other simultaneously. An example of a full-duplex device is a telephone; the parties at both ends of a call can speak and be heard by the other party simultaneously. The earphone reproduces the speech of the remote party as the microphone transmits the speech of the local party, because there is a two-way communication channel between them, or more strictly speaking, because there are two communication paths/channels between them.

#266. The marvels of technology keep evolving around us at record pace. Who would ever believe that Lisa Germani, Michael Nalepa and my TV Guide Network co-workers would be able to live my life with me? Before my co-workers turned up their volume to broadcast their voices (and assault and batterys) to my body, I was totally unaware that my life was being recorded and that every single detail about my life, even my bank passwords, were being recorded by Lionsgate's TV Guide Network broadcast operations machinery and shared with co-workers around the clock who were ratified to use this information about me that TV Guide Network's broadcast satellites kept recording, so that my coworkers could commit torts now and in the future that intentionally and negligently were meant to hurt me.

#137

#267. When Lisa Germani on October 15, 2010 made up a false, phony, official "sexual harassment" charge against me to retaliate against me because I spoke up to Lisa that very day before I went to grab lunch, not one of my co-workers stood up to Lisa or to Nancy Coleman (EVP of Human Resources, Lionsgate) to correct my situation. This shows all who are reading this document that I have personally been damaged and have personally suffered all kinds of injuries (economic, pain and suffering, out-of-pocket costs, life changes, etc.) because of the negligent intentional inflictions of emotional distress and terror that were perpetrated and kept in place on me, due to an overall atmosphere of fear to cure bad situations in the workplace that exists with Officers of Lionsgate. For some reason, the "Lionsgate Code" is one of intimidation, discrimination and retaliation, rather than a system of reward for making good faith reports about wrongdoing that one is witnessing taking place at the company.


#268. I am an U.S. citizen. I am supposed to be protected by United States Laws, including U.S. employment laws and anti-discrimination and anti-retaliation laws!

# 138

**SECTION ELEVEN: NEGLIGENT INTENTIONAL INFLICTIONS OF  
EMOTIONAL DISTRESS THAT I WAS MADE TO SUFFER THROUGH:**  
(including but not limited to :)

I feel that I am entitled to monetary compensation and future piece of mind from Lionsgate. I don't know how one can put a price on all that I have been through and all that I had to navigate through.

The Lionsgate Employee Manual that I and all newly-minted Lionsgate employees of TV Guide Network were issued on February 6, 2009 has strict instructions about Lionsgate's Company Code of Conduct and Ethics and employee conduct responsibilities.

	<u><b>Intentional Infliction of Emotional Distress #1:</b></u>
--	--

I was put into elongated situations of Sheer Terror and situations where I was in put into physical fear that my life was about to be taken away by satellite kidnappers and co-workers. These "interactive human games" were paid for by TV Guide Network and staffed by co-workers from Kristan Giordano's "Hollywood 411" and "Specials" production department. According to Michael Nalepa these "interactive human games" were designed to cause me to go into cardiac arrest because Lisa Germani and Michael Nalepa wanted me gone from TV Guide Network and wanted me gone from Doheny Drive Apartments. (2006, 2010, 2011, 2012, 2013)

#139





**Intentional Infliction of Emotional Distress #2:**

**Fear and Terror for the Safety of My Immediate Family**

I was put into 5 months of fear and sheer terror for the safety of my family who live in New York City. This included the safety of my elderly parents, safety of my younger twin brothers and safety of my two younger sisters. Also, I was put into fear for the safety of my 7 young nieces and nephews. In 2010, they ranged in age from 'just born' to 12 years old; and I was in fear that they were in danger of being hit with 'surprise satellite rape' with inability to leave from TV Guide Network co-workers, like the one I was victim to. When satellite rape happened to me, there was no 1-800 Number to call and the rape-battery was so powerful that it could have killed me. Certainly, a rape of this type would be very dangerous to their small bodies, very painful, terrifying to anyone, and an unjust crime for anyone to perform on them. Even just one high-wattage taser administered to them via TV Guide Network's satellite transponder would be very hurtful and frightening to a young child.

And a rape like this would have been unjust and unthinkable for my sisters to endure. And would have caused harm to my elderly parents if TV Guide Network's satellite technology would have been used on them as it had been used on me. (Intense emotional distress about this lasted from late August 2010 to December 26, 2010)

#140



**Intentional Infliction of Emotional Distress #3:**

**Fear and Terror for the Safety of David Geffen**

On December 24, 2010, I was put into fear and terror by Anne Alderete re: the safety of David Geffen. Without revealing all of the details in this document, I'll just state that Anne Alderete owes me, Lionsgate and the Court an explanation about the evening broadcast that she produced on Christmas Eve 2010 which went on for a few hours. (TV Guide Network paid for this.)

On August 18, 2010, I was also put into fear re: the immediate health of David Geffen. (That day my co-workers were broadcasting to me and without revealing all of the details in this document, I'll just state that there was an Obituary played via satellite to me, a transfer of power---and more! Michael Nalepa, (my #1 Witness) can explain what happened on this day to Lionsgate and to the Court, that TV Guide Network allegedly produced and paid for.



**Intentional Infliction of Emotional Distress #4:**

**Fear, Terror, Pain and Suffering**

On October 26, 2006, my body went into some sort of shock due to an "interactive human game" being played on me for hours via co-workers. Michael Nalepa has admitted that he and Lisa Germani were the ones

#141

responsible for this. The event was premeditated and designed to cause me to go into cardiac arrest. My body went into some sort of state of shock that night with some sort of unconsciousness during this event.

-Fear, Terror, Pain and Suffering for me was a daily affair from Mid-August 2010 through Mid-November 2010 from tasing effects to my genitals and constant fear of new tasing to my genitals. It was sexual assault! All tasing was administrated by one or more of my TV Guide Network co-workers who just wouldn't stop. (Finally tasing stopped in Mid-November 2010).

-Fear, Terror, Pain and Suffering returned exactly two years later, starting in November 2012 and continuing into mid-December 2012 when a whole new level of intentional infliction of emotional distress started. Suddenly my body was being hot-spot burned, electroshocked, muscle-bashed and these new types of assault were being delivered via the use of broadcast satellites to my body from Michael Nalepa, a former TV Guide Network co-worker who was not supposed to have satellite transponder access. Also, my eyes and body developed an intense sensitivity to lighting, more intense then had previously existed. I reached out to Lionsgate's Human Resources Department during this time and through Eileen Kohler I was able to put in my two worker's compensation claims. I was hoping that there would be some solution to the level of discomfort that my eyes and body were in due to the wattages and violent hits to my body that were being fired from TV Guide Network's Satellite Transponder.

-Throughout 2013 to today (December 8, 2015), Daily I still have emotional distress as I get an assortment of hot-spot burns, electroshocks, muscle-bashing, and sexual assault allegedly due to POP TV (formerly TV Guide Network's) machinery that is still assigned to monitor me 24/7, 365 days a year.

Comment- It's a shame that Richard Prell (Compliance Officer, Lionsgate) and that Jack Carey, (SVP of Operations, TV Guide Network, now POP TV) and that David Mandell (COO, POP TV) have not yet invited Michael Nalepa to be a special informant to them.

I know that Lionsgate, the Court and myself will be able to learn so much from Michael Nalepa that will allow sweeping changes to be made to the broadcasting and telecommunications industries so that no one ever again

#142

has to go through all that I was put through by TV Guide Network co-workers using satellite technology in ways never imagined (as weaponry, to attack, assault, disable, hurt, inflict distress on, etc.)

[REDACTED]



**Intentional Infliction of Emotional Distress #5:**

**Sexual Harassment** with lewd comments, humiliation comments, sexual ridicule about my body parts, and the pain and suffering from the sexual assaults of my female genitals caused emotional distress. I never knew when the next blast was going to hit. Would I be 'satellite raped' again? The fear and terror of what would happen next and when it would cease was sometimes overwhelming from minute to minute and was intentional infliction of emotional distress to me perpetrated by TV Guide Network co-workers.

TV Guide Network co-workers even stated that they somehow took nude footage of me that was put on the internet and emailed around town. Furthermore, it was stated multiple times that Ryan O'Hara, former President of TV Guide Network received an email that had an attachment of nude footage of me. And that others such as former boss Matt Singerman received an email of this footage, all in an attempt to cause me emotional distress just after I had been brutally "surprise satellite raped" in late August 2010.

[REDACTED]

#143





**Intentional Infliction of Emotional Distress #6:**

**Terror from Sexual Battery-Rape**

It was pre-meditated rape with a foreign object with my inability to leave. The rape was paid for by TV Guide Network and the foreign object was the force and manipulation of beams that were broadcast to my body from TV Guide Network's satellite transponder.

This event took place on August 16, 2010 from 1:36am until about 5:50am. While it was happening there were repeated questions in my mind as I navigated through the torture. Questions that I had in my mind included-- How much longer will this last? Will this return? There's no one to call! How do you make this stop? Why me? Who's behind this?

On July 14, 2013, the co-worker who did this to me (Michael Nalepa) admitted to me that he was the one responsible for this action which caused pain, absolute terror and emotional distress and that TV Guide Network paid for this entire thing.

#144



**Intentional Infliction of Emotional Distress #7:**

**Embarrassment and Feeling Degraded**

At times by their comments that were being delivered to me on the “always on” live satellite broadcast to me TV Guide Network co-workers tried to made me feel dirty, degraded, like a piece of trash that due to nude footage being sent around town of me, and other factors, was going to be of no further service to the television industry or to the Hollywood entertainment industry.

Co-workers who manned the “always on” satellite broadcast exacerbated any negative thing they possibly could exacerbate about Tricia Daniels (via their live broadcasts) meant to cause emotional distress to me. (This lasted from 8/2010 to 12/25/2010.)

On 12/26/10, when Rick Saloomey (Title: Supervising Producer, TV Guide Network Specials Department) and his team took over hosting and producing the “always on” Satellite Broadcast, I was rescued from all negative behaviors of my co-workers. I remained in the rescued mode (also hosted and produced by freelancer David Park and some ‘John and Jane Does’ who’s names are unknown to me at this time) from 12/26/10 to 10/16/12.

On 10/16/12, Michael Nalepa became host and producer of the Satellite Broadcast when Rick Saloomey and Kristan Giordano (Rick’s former boss who was Executive Producer of Specials, TV Guide Network) went to Brazil on assignment for TV Guide Network. Question- why didn’t Rick and Kristan just shut the Satellite Broadcast down? Why couldn’t they end it? Instead, I became victim to a whole new chapter of intense inflictions of emotional distresses and new pains and sufferings.


Today on December 8, 2015, as I write my complaint, Michael Nalepa, my former co-worker and tortfeasor who has turned into my #1 Witness has

#145

been maintaining this broadcast for 1149 DAYS, from October 16, 2012 to the present.

1149 Days also can be converted to the figure 27,576 hours. This means that for the most recent consecutive 27,576 hours of his life that Michael Nalepa has had the control of TV Guide Network's "always on" satellite. We have been tethered together in a "live" full duplex-simultaneous satellite broadcast....as I remain a prisoner of TV Guide Network's (now POP TV's) satellite technology and stuck in a situation that is an "inability to leave" situation for Lionsgate or Intelsat needs to disconnect the satellite broadcast from my body, which will free me.



	<u><b>Intentional Infliction of Emotional Distress #8:</b></u>
--	--

**Anguish, Frustration and Helplessness** resulting from Nancy Coleman's Negligent Infliction of Emotional Distress and Breach of Duty.

Nancy had a legal duty as the EVP of Human Resources for Lionsgate (the representative of my employer) to use reasonable care to avoid causing emotional distress, discrimination and retaliation to me and to adhere to Federal and State laws designed to protect me from such discriminations, retaliations and law-breaking Human Resources activities.

I allege that Nancy broke laws re: Fitness-For-Duty Exams, FMLA leaves, sexual harassment training and broke Lionsgate's internal law of "The Code," when she treated me unfavorably and un-equal to the way that she treated co-worker Lisa Germani.

During Nancy's HR administration era, I allege that Lionsgate broke Federal Employment Law (in May 2011, when I was let go from the company.) Federal law which prohibits falsification of a Company Lay-off

#146

chart for employees over the age of 50. (As reported in my May 7, 2013 letter to Richard Prell, (Compliance Officer, Lionsgate) the ADEA chart I received in my termination packet was incomplete and falsified.

My repeated requests to Nancy for her to investigate the co-worker crime-wave were not met which caused great distress to me and career damage to me and I feel that Lionsgate owes me recovery in the form of monetary damages to me, the injured individual, because of 'Nancy-Gate.'

Part of 'Nancy-Gate' was when she sent me for two Fitness-For-Duty Exams to Dr. David Zakin, PHD. (Telephone Number: 310-281-7028). Dr. Zakin can testify that he found me on my first visit to be in perfect mental health, totally fit for duty and told Nancy that I am totally fit and should be returned to the office. Instead of returning me to the office, Nancy returned me to Dr. Zakin for a second Fitness-For-Duty exam, where I again was in 'A-Plus Mental Health' and where Dr. Zakin again wanted Nancy to return me to the office.'

Nancy Coleman's discriminations and unfair treatment and retaliations to me were abominable. Perhaps Nancy was trying to just cover-up 'Nancy-Gate?' or perhaps it was easier for Nancy to discriminate and retaliate against me instead of Nancy standing up to co-worker Lisa Germani?

Now in 2015, we know that Michael Nalepa (my #1 Witness) was playing Lisa Germani on emails sent from Lisa Germani in 2011 to Nancy Coleman. On July 14, 2013, Michael newly admitted that he was involved in having Nancy send me to Dr. Zakin and that it was Michael Nalepa playing Lisa Germani by email (not Dr. Zakin) who told Nancy that 'the company wants Tricia Daniels to go on Psychotropic Drugs.'

On July 14, 2013, Michael also admitted to me that I was indeed wrongfully terminated because he needed to get himself back onto payroll as a TV Guide Network employee and that Lisa Germani, in 2011, during Michael Nalepa's post-employment era, still ratified and allowed Michael access to her company email and to Lionsgate owned broadcasting machinery. (Michael Nalepa can explain more to Lionsgate and to the Court).

In 2011, I had never heard the term 'Psychotropic Drugs' until Nancy Coleman discussed it. In 2011, I had to look up this term on the internet. Nancy in all of our phone conversations from February 2011 through the

# 147



remainder of my employment kept telling me via our telephone calls that 'the company wants you to go on Psychotropic Drugs,' and 'the company wants you to seek treatment where I'd be prescribed psychotropic drugs'

These 'Dr. Nancy' conversations caused undue discrimination and intentional infliction of emotional distress to me. Nancy was acting on her own bad accord to cover up her big Human Resources mess that had occurred at TV Guide Network. Why didn't Nancy just stand-up to Lisa Germani instead? And why did Lisa Germani continue to allow Michael Nalepa (Former Talent Department Assistant who in January 2011 had become a former employee) to use her email to do anything he could to hurt my life and mess up my employment with Lionsgate?



**Intentional Infliction of Emotional Distress #9:**

At times, in December 2015, I still have distress and worry that stems from when/where and how hurt I am going to get from the next blast or satellite slap or hot spot burn or muscle bash that is going to hit my body from TV Guide Network's (now POP TV's) satellite transponder.

I have been trying to get this situation cleared up with Lionsgate since October 2010. One can only imagine all of the frustration and Emotional Distress that comes from repeated discriminations and retaliations being thrown against you by Lionsgate's Officers, all because you are trying to make a series of reports about wrongdoing at the company that is personally happening to you.

Based on what I have gone through first-hand, I allege that Nancy Coleman, Richard Prell, Jack Carey and David Mandell have all breached their duty to me- a former employee of Lionsgate both in my employment years and in my post-employment years. These Lionsgate Officers have a

#148

scope of business duty to protect me and all employees while they are protecting Lionsgate. Yet they have left me in a state where I remain "imprisoned" by broadcast satellite technology, perhaps due to their fear of the possible legal floodgate that would become open if they would investigate and stand-up to employees and former employees of the company who have been involved in the misuse of company technology.

Interestingly, Michael Nalepa (my #1 Witness) is signed via a January 2011 Employee Separation Agreement to answer any questions that Lionsgate has for him. All Richard Prell, Jack Carey, Nancy Coleman or David Mandell needed to do was to call Michael and investigate my claims. Any of these four Lionsgate Officers could have cited for Michael Nalepa that the "Cooperation Clause" in his employee Separation Agreement has him already contracted to tell the truth in all matters that arose during his employment.



**Intentional Infliction of Emotional Distress #10:**

**The Inconveniences and loss of my freedoms to enjoy my life due to the impact that the satellite transponder beams have played on my eyes has caused emotional distress.**

My freedoms of life since 2009 have been severely impacted by the satellite umbrella that my eyesight has remained a prisoner to. During the years 2009 through April 25, 2014, while I still lived in Los Angeles, California, I was not able to have the freedoms that I used to have because of the man-made co-worker disability I was given to many forms of lighting including car headlights, street lights, and store lighting.

#149



**Intentional Infliction of Emotional Distress #11:**

**Wrongful Termination and Loss of Wages**

I was wrongfully terminated from my job, it caused career damages to me as well as economic loss. My job was the work that I loved, enjoyed, and work that I worked so hard at.

While Michael Nalepa has answers re: my layoff, it was said by different former co-workers that my layoff was a "Happy Birthday Present to Lisa Germani"- where I'd be let-go from the company and where I'd be offered a separation agreement where I'd sign it and waive all claims (known and unknown) against the company, against past owners, waive all claims against all employees including Lisa Germani and Michael Nalepa, waive all claims against all vendors including Intelsat, Encompass Digital Media, etc.

On May 19, 2011, Lions Gate did present me with a Separation Agreement which I did not sign. Lions Gate offered me just under \$50,000 (fifty thousand dollars) to waive all claims (known and unknown in perpetuity) and I wanted an investigation. Lionsgate owed me more than \$50,000 for all that I had been put through by Nancy Coleman and by my co-workers such as landmark privacy rights invasion, intentional inflictions of terror and emotional distress, even intentional pre-meditated "interactive human games" played out through broadcast satellite where I was put into terror a few times by co-workers that my life was about to end, because they were in a position to take my life away.

Additionally On May 19, 2011, when presented with the lump-sum payment Separation Agreement, even if the money consideration had been more than what I was offered, there was no way that I would have been able to sign the agreement, due to the "always on" co-worker satellite broadcast that connected my co-workers to me 24/7. For had I signed the agreement,

#150

the second that ink from my pen would have touched the signature line, I would have been in breach of the very covenants and clauses contained within the agreement concerning the confidentiality of the agreement's existence, as well as the amount of consideration.

I feel that I am also due recovery for sexual assault and battery with inability to leave, sexual harassment, and more. As an employee and subsequently as a former employee of Lionsgate, I've been put through a personal holocaust!



**Intentional Infliction of Emotional Distress #12:**

**Stress, Fear and at times Sheer Terror 24/7 when I was "Satellite Kidnapped" by voices that I didn't recognize for 6 weeks!**

This lasted from August 25, 2010 to October 12, 2010 —everyplace I went, voices that I didn't recognize were with me—and the voices were broadcasting to me in shifts. Someone was actually scheduling my kidnappers. My kidnappers accompanied me via the "live feeds" satellite to TV Guide Network's office, accompanied me to movie theatres, to restaurants, accompanied me while I was driving my car, and broadcasted to me at home, everywhere I went — around the clock! Soon some of my co-workers were broadcasting in shifts with my kidnappers.

On October 12, 2010 while I was driving my car down a street in Beverly Hills, in afternoon daylight, on my way to a Lionsgate advance movie screening for the film "For Colored Girls" which was opening November 5, 2010, a film which I was booking the stars of, and booking story coverage about for TV Guide Network, I was listening to my kidnappers via the "always on" satellite broadcast that was being beamed to my body as I was driving my car and I recognized pitches and tones in a voice of one of my


#151



kidnappers. This kidnapper had pitches and tones that were akin to TV Guide Network co-worker Laura Slobin's vocal pitches and tones. When I recognized one of my kidnappers as Laura Slobin, this broke the kidnapping chapter apart. It was Kristan Giordano's 'Hollywood 411' and 'Specials' staffs (including freelancers) that had worked in shifts all these weeks to broadcast to me and to monitor me "live" 24 hours a day, 7 days a week. The John Does and Jane Does who had been broadcasting to me were Kristan Giordano's staff.

During the 6 weeks that I was 'kidnapped,' my kidnappers caused terror and emotional distress to me...and they were my TV Guide Network co-workers and TV Guide Network paid for this whole thing!



	<p><b><u>Intentional Infliction of Emotional Distress #13:</u></b></p>
--	--

### **Anxieties and Inconveniences caused by co-worker interferences in my life!**

Interferences with my neighbors and with management of Doheny Drive Apartments (where I resided).

Even my next-door neighbor Lynda Noiseux was hired by TV Guide Network to cause terror-filled nights to me and to make me feel unsafe in my apartment. One day, I was afraid to even open up my apartment door to leave one morning for work due to the fear of personal harm that could come to me in the hallway of our building. This terror was caused by Lynda Noiseux.

On July 14, 2013---Michael Nalepa (my #1 Witness) newly revealed to me that my TV Guide Network co-workers were providing Lynda with scripts and instructions.

#152



**Intentional Infliction of Emotional Distress #14:**

**In November 2012 and December 2012--Emotional Distress from Sleeplessness**

I was able to sleep on my own just fine but due to the middle of the night satellite burning, electroshocking, muscle-bashing and tasing administrated to my body during these two months, I was put through some distressing and painful nights that TV Guide Network allegedly was still paying for. The network's broadcast satellite technology was battering me in a whole new assortment of ways.

I hadn't worked at TV Guide Network for 18 months—but 'the Tricia Daniels Show' was still on. TV Guide Network was still paying to give me a whole new chapter of intentional infliction of fear, terror, assault and batterys, life interruptions and emotional distress.

The last time that my co-workers had purposely kept me in a state where my sleep was constantly interrupted were in the nights of October 2010 including the couple of nights prior to October 15, 2010.

October 15, 2010 was the day when I before lunch went into co-worker Lisa Germani's office and peacefully confronted her as the alleged kingpin of the co-worker activity and I told her to STOP IT!

I needed her satellite broadcast to end!

#153



**Intentional Infliction of Emotional Distress #15:**

**Exacerbation by TV Guide Network co-workers (in August, September, October, November and in December 2010) via the satellite broadcast of anything that could possibly cause me any sort of intentional infliction of anxiety, anguish, bitterness or emotional distress.**

Anything that co-workers could exacerbate on, they did.

**Including But Not Limited to:**

-Nancy Coleman (EVP, Human Resources of Lionsgate) was going to be receiving \$3 Million Dollars from 'David Geffen's Will' and that Rochelle Kasten (a member of Nancy's Human Resources Department) was going to receive \$200,000 from 'David Geffen's Will' in a deal struck with them by Lisa Germani. (Co-workers repeatedly said this to me on their broadcasts).

-In Fall 2010, When TV Guide Network co-workers started discussing "The Golden Krendl Bas Cohen Murders"—it again made me fearful for the safety of the lives of my family not to mention my own life. Would I and my family be safe 'now and in the future' from intrusions, satellite rape with inability to leave, etc. from TV Guide Network co-workers.

-In late Summer 2010, there was talk from my co-workers while some were using their kidnapper voices during their broadcasting sessions to me, that Lisa Germani wanted me to arrive dead in a box (coffin) to New York for my father's 85<sup>th</sup> Birthday which would give him a possible heart attack. (Note: My father's 85<sup>th</sup> Birthday occurred on August 17, 2010).

-In Fall 2010, voices were broadcast of my brother Michael, of my mother and of my father. These family voices were only used a few times by co-workers during their satellite broadcasts.

#154

-A David Geffen voice was made by TV Guide Network co-workers and used on August 18, 2010 from the apartment above mine (at Doheny Drive Apartments). But when the David Geffen voice didn't sound at all like David Geffen to me, the voice was soon retired from use. That day there was also an obit played, a transfer of power and more! It was bizarre! I navigated through it all.

-On the satellite broadcast in Fall 2010, it was repeatedly said that Lisa Germani was going to be getting \$150 Million Dollars from "David Geffen's Will" and that Lisa had told co-workers that Mr. XXXX XXXXX, (Note: I am purposely omitting the name of this person) wants them to participate in the live satellite broadcasts that are being broadcast to Tricia Daniels. It was often said that some of these co-workers thought that they would be getting money from Lisa when she received the \$150 Million Dollars (or more) from "David Geffen's Will."

-As I stated earlier within this Complaint, Lynda Noiseux, my next door neighbor even had a list/or script of how much money TV Guide Network employees would each be getting via "David Geffen's Will" that she broadcast to me using TV Guide Network's satellite transponder.

-In late summer 2010, there was talk from the co-workers on the satellite broadcast that 'Michael from The Malibu Beach Inn' was sending a car to pick me up to take me out to Malibu but I'd never make it to Malibu because the car that Michael was sending was going to be getting into a pre-arranged car accident that night. Suddenly, I was scared that my co-workers could possibly rig-up a pre-arranged car accident to happen to me any place where I went. Even if I was crossing a street properly in a cross-walk, due to comments that had been made by my co-workers, there was a possibility of harm and impending doom coming my way from a possibly pre set-up car accident.

-In November 2010--- the satellite broadcasts just would not end! This caused intense distress. Why would my co-workers do this to me? At the time I was a Lionsgate employee and Nancy Coleman's bad faith and negligence and discriminations of me while she favored co-worker Lisa Germani just kept causing more intense distress and worry to me.

-In November 2010, co-workers on the "always on" satellite broadcast kept asking "Is she f-cked up yet?" It seemed that co-workers were upset that I

#155



wasn't 'f-cked-up' and that they wanted to keep their "interactive human games" (that's what I titled it) going on me until my life was totally ruined. It was said repeatedly that Lisa Germani wanted me to be broke, blind and destitute. And was also inferred that Lisa Germani wanted me to have some sort of documented mental illness so she could later claim that I hallucinated the Interactive Human Games that were played on me in 2006 and in 2010. It was inferred that Lisa wanted to have support materials and witnesses that would support her future statements that 'Tricia Daniels has some sort of mental illness — which I don't have at all. Furthermore, let it be known to all reading this complaint, that in my entire life I've never had any mental illness nor sign of mental illness or mental health issues of any kind.

In January 2013, two years later, as part of my Worker's Compensation claim, The Hartford Insurance company sent me for a mental health examination/neurological evaluation to Dr. Jerome H. Franklin, M.D. in Beverly Hills who specializes in Psychiatry and Neurology (His Telephone Number is: 310-276-0809).

When I paid my visit to Dr. Franklin in January 2013 the conclusion was just as Dr. David Zakin two years earlier had concluded—that I am in A-Plus Mental Health. Dr. Franklin did recognize the lighting sensitivity that my eyes and body had developed but said that he hoped in time that the lighting sensitivity condition will improve or will get easier to live with.

#156

**SECTION TWELVE: LIST OF U.S. SATELLITE EXPERTS AND CONSULTANTS**

#1:

Bruce Elbert

President and Founder, Application Technology Inc.

Location Headquarters: Georgetown, Texas

Telephone Number: (512) 943-0454

Email: [bruce@applicationstrategy.com](mailto:bruce@applicationstrategy.com)

Website: <http://www.applicationstrategy.com/index.php>

#2:

Kurt Hanson

VP of Engineering Services and Systems Support, Broadcasting Operations and Engineering (BO&E) group, ABC Television Network

Location Headquarters: New York, NY

Contact: Tom W. Davidson, Attorney (Akin, Gump, Strauss Hauer & Feld, LLP) Telephone: (202) 887-0411 email: [tdavidson@akingump.com](mailto:tdavidson@akingump.com)

Note: Tom W. Davidson worked with Kurt Hanson earlier this year on a satellite interference problem that WABC-TV (New York, NY) was having with Verizon Wireless.

#157

#3:

Bill Tillson

Executive Chairman, Encompass

Location Headquarters: 7 locations including New York, NY and Los Angeles, CA

Website: [www.encompass.tv](http://www.encompass.tv)

Telephone Numbers and Addresses of two New York, NY locations

545 Fifth Avenue/Suite 1200

New York, NY 10017

+1 212.599.1391

60 Hudson Street

New York, NY 10013

+1 212.599.1391

#4:

Greg Hughes

Former Director of Operations, TV Guide Network; Greg presently works for Revolt TV, the U.S. Cable Television Network, in Los Angeles, CA. His title is Studio Technical Manager

Work address: Revolt TV, 1800 N. Highland Avenue, 6<sup>th</sup> floor, Los Angeles, CA 90028

#158

**EXHIBIT #1**

**WRITTEN THREAT FROM DAVID MANDELL**

In the form of a "Cease & Desist" Email sent to me on  
February 5, 2014

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

#159



## Cease & Desist

## Cease & Desist

David Mandell (David.Mandell@tvgn.tv)

Add to contacts

2/05/14

To: triciadaniels@live.com



Dear Ms. Daniels,

This matter has been brought to my attention and I understand there is a long history to it. However, at this point, on behalf of the company, we must insist that you refrain from making any and all further attempts to contact any of the company's current or former employees and/or members of their families. Your communications have been an on-going source of business disruption. While we would prefer to simply receive your acknowledgment of this communication and assurance that you will not make any further contact, if you ignore our request and persist with these communications, we will seek appropriate remedies available to us including, but not limited to, seeking an injunction and/or contacting the police department.

We apologize for the tone of this communication, but feel it is necessary at this time.

# 160

We look forward to receiving your acknowledgment and assurance.

Sincerely,

David Mandell

DAVID MANDELL | General Counsel / EVP, Business & Legal Affairs

TVGN | A CBS/Lionsgate Joint Venture

5510 Lincoln Avenue 4<sup>th</sup> Floor | Playa Vista, CA 90094

TEL: 323.856.4081 | EMAIL: david.mandell@tvgn.tv

© 2015 Microsoft

[Terms](#)

[Privacy & cookies](#)

[Developers](#)

[English \(United States\)](#)

#161

**EXHIBIT #2**

**MY EEOC COMPLAINT/CHARGE**

**Made on September 18, 2015**

With Some (Not All) of the  
Exhibits that I included.

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

#162

Date: September 18, 2015

From: Tricia Daniels  
67-29 Bell Blvd, Lower Apartment  
Oakland Gardens, NY 11364  
Email: [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)  
Cell: 310-614-3408

To: EEOC Intake Staff  
New York District Office, EEOC  
33 Whitehall Street, 5<sup>th</sup> floor  
New York, NY 10004

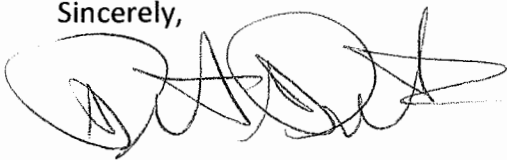
**Re: Charge of Employment Discrimination against Lionsgate Entertainment Corp. and TV Guide Network (now POP TV).**

To: Whom It May Concern:

Enclosed, please find the necessary documentation to form a formal charge of discrimination and on-going retaliation against Lionsgate Entertainment Corp. and *TV Guide Network (now POP TV)*. I have enclosed the EEOC Intake Questionnaire and trust the same will be sufficient for the EEOC to launch its immediate investigation into the matters alleged.

I can be reached with questions at 310-614-3408 or [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)

Sincerely,

A handwritten signature in black ink, appearing to read 'Tricia Daniels', with a large, stylized flourish at the end.

Tricia Daniels

Enclosures

#163





## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Thank you for using the EEOC Assessment System. The information you gave us indicates that your situation may be covered by the laws we enforce. If you want to file a charge, you can start the process by filling out the Intake Questionnaire, signing it, and either bringing it or mailing it to the EEOC office listed below right away. If you live within 50 miles of the EEOC office listed below, we recommend that you bring the completed questionnaire with you to this office to discuss your situation.

Please visit the EEOC website  
to obtain a mailing address.

If you would like to bring the questionnaire to us in person instead of mailing it to us, please click <http://www.eeoc.gov/field/index.cfm> to find out the office hours of the EEOC office closest to you. If you would like to fax the questionnaire to us, please click <http://www.eeoc.gov/field/index.cfm> to find out the fax number of the office nearest to you.

You should be aware that filing a charge can take up to two hours. If you find that you are having difficulty completing the questionnaire on your own, you may call the number below for assistance.

Please be sure to:

- Answer all questions as completely as possible.
- Include the location where you work(ed) or applied.
- Complete all pages and sign the last page.
- Attach additional pages if you need more space to complete your responses.

You can find out more information about the laws we enforce and our charge-filing procedures on our website at [www.eeoc.gov](http://www.eeoc.gov).

If you want to file a charge about job discrimination, there are time limits to file the charge. In many States that limit is 300 days from the date you knew about the harm or negative job action, but in other States it is 180 days. To protect your rights, it is important that you fill out the questionnaire, sign it, and bring it or send it to us right away.

**Filling out and bringing us or sending us this questionnaire does not mean that you have filed a charge.** This questionnaire will help us look at your situation and figure out if you are covered by the laws we enforce. If you live within 50 miles of the office listed above, we recommend that you bring the completed questionnaire to us to discuss your situation. If you mail the completed questionnaire to us, someone from the EEOC should contact you by mail or by phone within 30 days. If you don't hear from us in 30 days, please call us at **1-800-669-4000**.

Sincerely,

U.S. Equal Employment Opportunity Commission

#164



## EQUAL EMPLOYMENT OPPORTUNITY COMMISSION INTAKE QUESTIONNAIRE

Please immediately complete the entire form and return it to the U.S. Equal Employment Opportunity Commission ("EEOC"). **REMEMBER**, a charge of employment discrimination must be filed within the time limits imposed by law, generally within 180 days or in some places 300 days of the alleged discrimination. Upon receipt, this form will be reviewed to determine EEOC coverage. **Answer all questions as completely as possible, and attach additional pages if needed to complete your response(s). If you do not know the answer to a question, answer by stating "not known."** If a question is not applicable, write "n/a." Please Print.

### 1. Personal Information

Last Name: Daniels First Name: Tricia MI: A  
 Street or Mailing Address: 67-29 Bell Blvd. Apt Or Unit #: Lower Apt  
 City: Oakland Gardens County: \_\_\_\_\_ State: New York ZIP: 11364  
 Phone Numbers: Home: ( 310 ) 614-3408 Work: ( N/A ) N/A  
 Cell: ( 310 ) 614-3408 Email Address: triciadaniels2@gmail.com  
 Date of Birth: 09/14/60 Sex: Male ☐ Female ☒ Do You Have a Disability? ☐ Yes ☒ No  
**Please answer each of the next three questions.** i. Are you Hispanic or Latino? ☐ Yes ☒ No  
 ii. What is your Race? Please choose all that apply. ☐ American Indian or Alaska Native ☐ Asian ☒ White  
☐ Black or African American ☐ Native Hawaiian or Other Pacific Islander  
 iii. What is your National Origin (country of origin or ancestry)? N/A

### Please Provide The Name Of A Person We Can Contact If We Are Unable To Reach You:

Name: Caroline Daniels Relationship: sister  
 Address: 42-15 212 Street City: Bayside State: NY Zip Code: 11364  
 Home Phone: ( 718 ) 428-2407 Other Phone: ( 646 ) 872-7446

### 2. I believe that I was discriminated against by the following organization(s): (Check those that apply)

☒ Employer ☐ Union ☐ Employment Agency ☐ Other (Please Specify) \_\_\_\_\_

**Organization Contact Information** (If the organization is an employer, provide the address where you actually worked. If you work from home, check here ☐ and provide the address of the office to which you reported.) **If more than one employer is involved, attach additional sheets.**

**Organization Name:** LIONSGATE Entertainment Corp.  
 Address: 2700 Colorado Avenue., Suite 200 County: \_\_\_\_\_  
 City: Santa Monica State: CA Zip: 90404 Phone: ( 310 ) 449-9200  
 Type of Business: Entertainment, TV & Film Job Location if different from Org. Address: 1800 N. Highland Ave, LA, CA 90028  
 Human Resources Director or Owner Name: Ross Pollack, EVP & Chief Human Resources Officer Phone: 310-449-9200  
**Number of Employees in the Organization at All Locations:** Please Check (✓) One  
☐ Fewer Than 15 ☐ 15 - 100 ☐ 101 - 200 ☐ 201 - 500 ☒ More than 500

### 3. Your Employment Data (Complete as many items as you can) Are you a Federal Employee? ☐ Yes ☒ No

Date Hired: 08/09/2004 Job Title At Hire: Talent Booker  
 Pay Rate When Hired: about \$2200 per week Last or Current Pay Rate: \$2361.81 per week  
 Job Title at Time of Alleged Discrimination: Senior Story Editor Date Quit/Discharged: 05/19/2011 (Terminated)  
 Name and Title of Immediate Supervisor: Lisa Germani, Director of Talent Department, Lionsgate/TV Guide Network

#165

If Job Applicant, Date You Applied for Job \_\_\_\_\_ Job Title Applied For \_\_\_\_\_

**4. What is the reason (basis) for your claim of employment discrimination?**

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination, and a negative action was threatened or taken, you should check the box next to Retaliation.

☐ Race ☐ Sex ☒ Age ☐ Disability ☐ National Origin ☒ Religion ☒ Retaliation ☐ Pregnancy ☐ Color (typically a difference in skin shade within the same race) ☐ Genetic Information; choose which type(s) of genetic information is involved:  
☐ i. genetic testing ☐ ii. family medical history ☐ iii. genetic services (genetic services means counseling, education or testing)

If you checked color, religion or national origin, please specify: I am Jewish. Lisa Germani, Anne Alderete and others are not Jewish.

If you checked genetic information, how did the employer obtain the genetic information? \_\_\_\_\_

Other reason (basis) for discrimination (Explain). Ongoing Harassment/Ongoing Retaliation for standing up to Lisa Germani & Nancy Coleman

**5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name(s) and title(s) of the person(s) who you believe discriminated against you. Please attach additional pages if needed.**

(Example: 10/02/06 - Discharged by Mr. John Soto, Production Supervisor)

A) Date: \_\_\_\_\_ Action: Denied Arbitration. I have been signed since Feb 6, 2009 to 'arbitrate not sue' and Mandell is denying this benefit which I am contracted for, depriving me of economic compensation I'm due.  
September 8-9, 2015

Name and Title of Person(s) Responsible: David Mandell, COO, General Counsel and Executive Vice President, Pop TV

B) Date: \_\_\_\_\_ Action: Threatened me in writing with possible injunction and/or police report. Issued "Cease & Desist" prohibiting me from contacting current and former employees of the company.  
February 5, 2014

Name and Title of Person(s) Responsible: David Mandell, General Counsel and EVP, Lionsgate's TV Guide Network (now Pop TV)

**6. Why do you believe these actions were discriminatory? Please attach additional pages if needed.**

From October 2010 through August 2015, I spoke up in person, by phone, by email and by mailed reports (over 23 reports) to company officials detailing criminal activities and FCC Licensee misuses taking place at Lionsgate. I got repeatedly punished by Lionsgate's Human Resources Dept. Also- in September 2015 and in Feb 2014 by David Mandell, COO of TV Guide Network (now Pop TV) for being assertive and standing up. Instead of fixing problems I was repeatedly punished, harassed, retaliated against, terminated & in 9/2015 denied my rights of JAMS Arbitration.

**7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title?**

Nancy Coleman (EVP of HR, Lionsgate) punished me for oral & emailed reports I made of misconduct. My co-workers were using our FCC License, satellite transponder & broadcast operations machinery and created a 24/7, daily "Tricia Daniels sexual harassment broadcast." Co-workers thought David Geffen was going to leave me money in his will and were out to hurt me via "Live Feeds" I needed it to stop. Instead of being honest with me that Lisa Germani wanted me terminated, Nancy maliciously and frequently punished me through a series of actions, then termination.

**8. Describe who was in the same or similar situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the race, sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.**

**Of the persons in the same or similar situation as you, who was treated better than you?**

A. Full Name	Race, sex, age, national origin, religion or disability	Job Title
Every other Lionsgate employee was treated	better than me. We are all signed in our "New Hire" forms	to Arbitrate through JAMS ADR-not sue!
Description of Treatment All Lionsgate employees are signed to arbitrate any claims whatsoever that arose or arise anytime in future out of our employments. I am signed & bound to this clause via the same "new hire" forms that every other employee is signed to.		
B. Full Name	Race, sex, age, national origin, religion or disability	Job Title
Lisa Germani	White, Female, Age 37-38, Catholic/Christian	Director, Talent Department
Description of Treatment Lisa was not thrown out of the office, not put on leave of absence, not made to take fitness-for-duty exams. Lisa was allowed to get away with filing malicious phony charges against me, Lisa's criminal misuse of satellites was condoned.		

#166



**Of the persons in the same or similar situation as you, who was treated worse than you?**

A. Full Name	Race, sex, age, national origin, religion or disability	Job Title
Julia Rolfe	White Female, 39 yr. old employee when she died 7/4/10	Producer

**Description of Treatment** Lisa Germani & co-workers also used our FCC License, earth stations, satellite transponder and broadcasting machines when they created a 24/7, daily "Julia Rolfe Satellite Broadcast." Julia died when she got killed by this technology.

B. Full Name	Race, sex, age, national origin, religion or disability	Job Title
N/A	N/A	N/A

**Description of Treatment** N/A

**Of the persons in the same or similar situation as you, who was treated the same as you?**

A. Full Name	Race, sex, age, national origin, religion or disability	Job Title
N/A	N/A	N/A

**Description of Treatment** N/A

B. Full Name	Race, sex, age, national origin, religion or disability	Job Title
N/A	N/A	N/A

**Description of Treatment** N/A

**Answer questions 9-12 only if you are claiming discrimination based on disability. If not, skip to question 13. Please tell us if you have more than one disability. Please add additional pages if needed.**

**9. Please check all that apply:**

- ☐ Yes, I have a disability  
☐ I do not have a disability now but I did have one  
☒ No disability but the organization treats me as if I am disabled

**10. What is the disability that you believe is the reason for the adverse action taken against you? Does this disability prevent or limit you from doing anything? (e.g., lifting, sleeping, breathing, walking, caring for yourself, working, etc.).**

As part of their sexual assault, sexual harassment and life assault campaign on me, Lisa Germani led my co-workers in giving me an eye disability. The beams from the satellite transponder and the wattage aimed at my body from our broadcasting operations machinery (earth stations, antennas, reflectors, etc.) made my eyes, and my entire skin incompatible with all types of indoor lighting. Lisa & her team kept increasing the wattages on me.

**11. Do you use medications, medical equipment or anything else to lessen or eliminate the symptoms of your disability?**

Yes ☒ No ☐

If "Yes," what medication, medical equipment or other assistance do you use?

In 2009, I moved floors. In 2009 and in 2010 I needed to wear sunglasses in the office while I performed my work. The co-worker-made lighting disability got even worse so I purchased foil auto shields that I draped around my cubicle to block out the office lighting that was burning my body.

**12. Did you ask your employer for any changes or assistance to do your job because of your disability?**

Yes ☒ No ☐

If "YES", when did you ask? In Fall 2009, Again in 2010 How did you ask (verbally or in writing)? verbally

Who did you ask? (Provide full name and job title of person)

Nancy Coleman, Rochelle Kasten (both, Human Resources, Lionsgate), Greg Hughes (Director of Operations, TV Guide Network)

Describe the changes or assistance that you asked for:

In 2009, I reported that the office lighting had become too harsh in my area. I was not yet aware that my co-workers were using broadcasting machinery on me that was the culprit. I was not yet aware that I was being criminally monitored by Broadcast Satellite 24/7, 365 days a year for I would have reported it. In 2009, I was suddenly getting badly burned from office lighting and I needed a darker area of the office to work from.

How did your employer respond to your request?

In 2009, Rochelle Kasten helped me find a new cubicle that would shield me more from office lighting. In 2009, Greg Hughes (Director, Operations) was helping Rochelle and he was rude to me. It was like Greg was trying to rile me up into suing the company! Greg made no sense. Today, in Sept. 2015 as I look back, all Greg had to do was to log into broadcasting operations machinery to disconnect the satellite live feeds from my person.

#167



13. Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say. (Please attach additional pages if needed to complete your response)

A. Full Name	Job Title	Address & Phone Number
Michael Nalepa	Talent Department Assistant	Address: 4937 Ledge Avenue, Toluca Lake, CA 91601 Telephone: (323) 387-0849

What do you believe this person will tell us?

I believe that Mr. Nalepa will 100 per cent confirm all of the facts that I am reporting. See more information about Michael Nalepa in "Position A" on my Witness List. Mr. Nalepa will also confirm that I am signed via my Lionsgate "New Hire" forms to Arbitrate through JAMS Arbitration.

B. Full Name	Job Title	Address & Phone Number
George R. Cuervos	Case Manager, JAMS Arbitration	Address: 620 8th Avenue, New York, NY 10018 Telephone Direct Dial: (212) 607-2789

What do you believe this person will tell us?

Mr. Cuervos told me 2 or 3 times during our telephone calls that he personally felt that Mr. David Mandell of Lionsgate was lying to him when Mr. Mandell stated that my "new hire" form with the JAMS clause was lost and that employees of my era and position were not signed to arbitrate.

14. Have you filed a charge previously in this matter with EEOC or another agency? Yes ☐ No ☒

15. If you have filed a complaint with another agency, provide name of agency and date of filing:

16. Have you sought help about this situation from a union, an attorney, or any other source? Yes ☒ No ☐

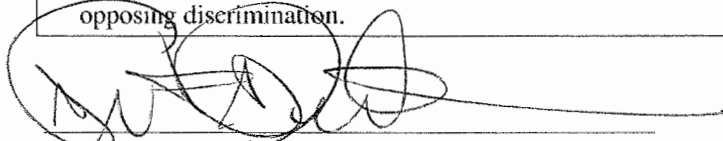
Provide name of organization, name of person you spoke with and date of contact. Results, if any?

Pianko Law Group PLLC, Maurice Pianko, Esq. 30 Broad Street, 14th Floor, New York, NY 10004 email: Mpianko@gmail.com, Tel: (646) 801-9675. On Sunday, September 13, 2015, I spoke with Maurice by telephone and communicated with him via emails. Result: Mr. Pianko was not familiar with Broadcast Satellites, Satellite Harassment, FCC licensee wrongdoing and did not feel that he was able to legally represent me.

Please check one of the boxes below to tell us what you would like us to do with the information you are providing on this questionnaire. If you would like to file a charge of job discrimination, you must do so either within 180 days from the day you knew about the discrimination, or within 300 days from the day you knew about the discrimination if the employer is located in a place where a state or local government agency enforces laws similar to the EEOC's laws. If you do not file a charge of discrimination within the time limits, you will lose your rights. If you would like more information before filing a charge or you have concerns about EEOC's notifying the employer, union, or employment agency about your charge, you may wish to check Box 1. If you want to file a charge, you should check Box 2.

Box 1 ☐ I want to talk to an EEOC employee before deciding whether to file a charge. I understand that by checking this box, I have not filed a charge with the EEOC. I also understand that I could lose my rights if I do not file a charge in time.

Box 2 ☒ I want to file a charge of discrimination, and I authorize the EEOC to look into the discrimination I described above. I understand that the EEOC must give the employer, union, or employment agency that I accuse of discrimination information about the charge, including my name. I also understand that the EEOC can only accept charges of job discrimination based on race, color, religion, sex, national origin, disability, age, genetic information, or retaliation for opposing discrimination.

  
Signature

9/18/15  
Today's Date

**PRIVACY ACT STATEMENT:** This form is covered by the Privacy Act of 1974: Public Law 93-579. Authority for requesting personal data and the uses thereof are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Intake Questionnaire (9/20/08).
2. **AUTHORITY.** 42 U.S.C. § 2000e-5(b), 29 U.S.C. § 211, 29 U.S.C. § 626, 42 U.S.C. 12117(a), 42 USC §2000ff-6.
3. **PRINCIPAL PURPOSE.** The purpose of this questionnaire is to solicit information about claims of employment discrimination, determine whether the EEOC has jurisdiction over those claims, and provide charge filing counseling, as appropriate. Consistent with 29 CFR 1601.12(b) and 29 CFR 1626.8(c), this questionnaire may serve as a charge if it meets the elements of a charge.
4. **ROUTINE USES.** EEOC may disclose information from this form to other state, local and federal agencies as appropriate or necessary to carry out the Commission's functions, or if EEOC becomes aware of a civil or criminal law violation. EEOC may also disclose information to respondents in litigation, to congressional offices in response to inquiries from parties to the charge, to disciplinary committees investigating complaints against attorneys representing the parties to the charge, or to federal agencies inquiring about hiring or security clearance matters.
5. **WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION.** Providing of this information is voluntary but the failure to do so may hamper the Commission's investigation of a charge. It is not mandatory that this form be used to provide the requested information.

Date: September 18, 2015

From: Tricia Daniels  
67-29 Bell Blvd, Lower Apartment  
Oakland Gardens, NY 11364  
Email: [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)  
Cell: 310-614-3408

To: EEOC Intake Staff  
New York District Office, EEOC  
33 Whitehall Street, 5<sup>th</sup> floor  
New York, NY 10004

Subject: Personal Thoughts.

It is my feeling that Lionsgate Entertainment Corp., managing owner of TV Guide Network (now Pop TV) really fell down on their employer responsibilities to me, an employee, who remains a victim of one of the worst on-going retaliation, harassment and workplace sexual harassment assault crimes ever.

Let me ask the EEOC this question: Does a public company like Lionsgate have a responsibility to do everything in their power to have a safe workplace? To have a workplace free from harassment, retaliation and discrimination? A workplace free from both Human Rights and Human Resources criminal activities?

Isn't it Lionsgate's legal responsibility to adhere to and to strictly uphold and enforce the company designated internal grievance procedure that employees from my era of employment are signed through our "new hire" forms to use? I accuse current Lionsgate management officer David Mandell (Title: COO, General Counsel and Executive Vice President) of denying my equal rights, just because he is personally trying to cover-up his own questionable conduct where in writing Mandell threatened me with an injunction! (See Exhibit #1)

Between September 8-9, 2015, just days ago, David Mandell retaliated against me anew when he denied me my contracted Lionsgate grievance procedure (through JAMS Arbitration) Mandell was not with Lionsgate in the years 2009, 2010, 2011, 2012 and was not with Lionsgate for most of 2013. He was not in the room with myself and more than 60 fellow employees when we signed our Lionsgate "New Hire" forms on February 6, 2009.

What good are rules and procedures outlined in the Lionsgate Employee Manual if the Human Resources Department as well as Richard Prell, Lionsgate's Compliance Officer, both retaliate

#169

against employees and former employees when we stand-up and make a series of reports about lawbreaking, criminal activity STILL taking place at the company?

Does a company such as Lionsgate have the obligation to adhere to New York State and California State Laws and Federal Laws? Does a public company such as Lionsgate have a responsibility to the FCC and to all other U.S. government licensed broadcasters to adhere to the FCC's strict rules and bylaws for licensees? Does a company such as Lionsgate have a responsibility to stop Lisa Germani (Director, Talent Department) from purposely fabricating a series of malicious and untrue accusations about me and other employees? Doesn't Nancy Coleman (EVP of Human Resources, Lionsgate) have a responsibility not to favor Lisa Germani's fabricated, unscrupulous reports? Nancy Coleman (EVP, Human Resources, Lionsgate) unfairly favored Lisa Germani and conspired with Lisa to put me through a series of devious and deceitful and demoting Human Resources abominations to punish me for standing up and confronting both Lisa and Nancy on different occasions about their abominable, wrongful employee treatment of me.

Nancy Coleman's series of pernicious on-going retaliations against me were designed by her to mess up my employment. Her bag of tricks included: putting me on a forced leave of absence and work stoppage, sending me for two humiliating and emotionally distressful fitness-for-duty exams, she repeatedly told me "the company wants you to take psychotropic drugs." Nancy never let me return to the office. Through all of my dealings with Nancy – she wouldn't allow me to ever again meet in person with her, she would not investigate my claims. Nancy self-governed herself and for Nancy it was easier to squash my employment, even try to put me on a false State Disability Insurance claim to get me out of the workplace, where I would not be able to make any more reports of company wrongdoing then for Nancy to stand-up to my co-worker Lisa Germani. Nancy had blonde hair, Lisa had blonde hair, and I am a brunette. Maybe Nancy was just all-out afraid to stand-up to Lisa Germani to tell Lisa to "STOP"-- given Lisa's history at our company of being an 'employment terminator.' Lisa personally reveled in her ability to unscrupulously terminate the employment of anyone, at any time whom she found inferior to herself or who she was jealous of.

On the last day of my employment with Lionsgate (May 19, 2011) I received an Employment Release Offer, (also known as an employment separation agreement) where Lionsgate offered me just under \$50,000 to waive all claims. However, I was not able to sign this Employment Release as the amount of money that was being offered to me was not anywhere what I should have been offered for the career damage and pernicious and frequent series of adverse employment actions that Nancy Coleman (EVP, Human Resources) and Lisa Germani (Director, Talent Department) instilled against me.


Also-I was not able to sign my Employment Release offer upon my termination due to "Lisa Germani's Privacy Rights Invasion Satellite Media Tour," which was Lisa's 24/7, 365 days a year "always on" satellite surveillance and monitoring of me. For, I would have been in violation of

#170

the confidentiality clauses in Lionsgate's offered separation agreement the second my pen touched the signature line.

I can be reached with questions at 310-614-3408 or [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)

Sincerely,

A handwritten signature in black ink, appearing to read 'Tricia Daniels', with a long horizontal flourish extending to the right.

Tricia Daniels

#171



**#5- ADDITIONAL PAGES:**

**5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name (s) and title (s) of the person (s) who you believe discriminated against you. Please attach additional pages if needed**

**Timeline of On-Going Retaliation Actions. This list starts with the most recent 2015 actions and ends with the earliest 2010 actions of retaliation and employment discrimination.**

**A)**

**Date:** September 8-9, 2015

**Action:** Denied Arbitration

**Name and Title of Person Responsible:** David Mandell, COO, TV Guide Network (now Pop TV)

**Details:**

For current and former employees of Lionsgate's TV Guide Network, our official Lionsgate internal and anytime in the future, post-employment grievance procedure is to go to Final and Binding Arbitration together through JAMS ADR (Lionsgate's Arbitration vendor).

I and all other employees of my era and employees of positions equal to, lower than and higher than mine are contracted through our signed and dated Lionsgate "new hire" forms for this Lionsgate grievance procedure and employee benefit.

I and at least 60 fellow employees signed our "new hire" paperwork, in the same room together, on February 6, 2009 before Randy Young of Lionsgate's Human Resources Department. Right after I signed my "new hire" paperwork I was a full employee of Lionsgate. I worked, I got paid, I received benefits, I worked, I got paid, and I received benefits, and this continued for the remainder of my employment. In other words, I fulfilled my contract to Lionsgate and Lionsgate fulfilled its payment and benefits contract to me. One of the provisions and protections of my employment with Lionsgate was post-employment grievance resolution through JAMS Arbitration.

David Mandell's new retaliatory action against me on Sept 8-9, 2015 where he denied my contracted arbitration agreement with Lionsgate is malicious, discriminatory and a new adverse intimidation action towards me because both during and after my Lionsgate employment, I made over 23 reports of company misconduct that to this day stands uncorrected. (The latest report of continued misconduct is contained within the pages of my August 2015 Jams Arbitration Demand) (See: Exhibit #2)

The last time that I made a post-termination report of company wrongdoing (on February 5, 2014), David Mandell threatened me in writing with an injunction and/or police report. (See section "B"-just below for more information about this.) Also see

Exhibit # 1 for David Mandell's threat to me known as "David Mandell's Cease & Desist email."

I accuse David Mandell on Sept 8-9, 2015 of discrimination and of a new action of ongoing retaliation against me. By refusing my JAMS arbitration demand, David Mandell is singling me out and is denying me my protected right and my former employee protected benefit to the activity of arbitration. I feel that David Mandell is trying to intimidate me and is continuing TV Guide Network's on-going retaliation campaign against me that has lasted more than 4 years since my employment was terminated.

By his denial of my protected and contracted right to JAMS Arbitration with Lionsgate, I feel that David Mandell is trying to entice me into sending him a protest letter about his denial of my arbitration, so that he in turn can go ahead and call any new contact from me where I stand up for my rights, what he terms to be "business disruption." For if I create new "business disruption" for David Mandell, he can go forward with his threat to obtain a court ordered injunction against me that would last for the rest of my lifetime where I would be 'gagged' and wouldn't be allowed to discuss the following:

- 1) TV Guide Network (now Pop TV's) unlawful misuse of their FCC License (a U.S. government broadcasting business license). No reasonable person would stay silent about the wrongdoing and public safety hazard that has been created by the misuse of TV Guide Network's broadcasting operations machinery (earth stations, satellite transponder, transmitter, FCC Licensed broadcasting frequencies, etc.)
- 2) An injunction by David Mandell would be able to keep me quiet about the July 4, 2010 death of co-worker Julia Rolle (Title: Producer) while she was off-the-clock. According to co-worker Michael Nalepa, Julia, like me, had TV Guide Network's broadcast satellite transponder and operations machinery monitoring and surveilling her 24/7, 365 days a year.

Michael Nalepa has details that he has personally shared with me about how Julia's life abruptly ended when she got killed by TV Guide Network's satellite technology that was assigned to surveille her. "Julia didn't even know what hit her" is what Michael Nalepa has told me repeatedly. Outrageously, Julia on July 4, 2010 didn't make it through.

- 3) An injunction by David Mandell would be able to keep me quiet about TV Guide Network's "David Geffen Will Game." When a group of co-workers thought that entertainment mogul David Geffen was going to leave me a large sum of money in the future, through his 'Last Will and Testament,' this group of my TV Guide Network co-workers worked in collusion together to lay the groundwork so they'd be able to commit current and future "bling-ring" types of tort crimes on me including privacy rights invasions using broadcast satellites,

apartment theft, off-the-clock monitoring, terrorizing me by imprisoning me in "live" terror-filled satellite broadcasts through Lisa Germani's "always on" broadcast satellite hook-up.

In the apartment building where I lived, a neighbor was strategically placed next-door to me by my co-workers. This neighbor (named Lynda P. Noiseux) caused a great deal of at-home intentional infliction of emotional distresses to me. My co-workers also interfered in my relationships with my landlord, with my sister-in-law, and put 'into play' one longtime friend of mine named Laurie D. Muslow.

- 4) An injunction by David Mandell would also be able to keep me quiet about respondeat superior liabilities, vicarious liabilities, qui facit per alium facit per se liabilities and about employer ratification liabilities that I have had to endure. Company management employees Jack Carey (Title: Senior Vice President of Operations, TV Guide Network,) Paul Adler (Title: Senior Vice President of Original Programming) and Kristan Giordano (Title: Vice President of Original Programming) have responsibilities to Lionsgate, have responsibilities to Lionsgate's stock holders, and have responsibilities to satellite vendors such as Intelsat and Encompass Digital Media to forbid the misuse of satellites. Jack, Paul, and Kristan are management employees whose scope of business it is to protect and supervise the use of broadcast technology assets.
- 5) An injunction by David Mandell would also be able to keep me quiet about David Mandell's outrageous and malicious "Cease & Desist" "legal threat" that he emailed to me on February 5, 2014. An injunction would silence me from discussing the document and/or showing this threatening document to anyone. (See Exhibit #1).
- 6) An injunction by David Mandell would also be able to keep me quiet about longtime co-worker Lisa Germani's history of wrongdoing at the company. Keeping Lisa's history of wrongdoing hushed-up is an issue for current employees because Lisa is a good friend of Kelly Kahl. Kelly Kahl sits on the Board of Directors of TV Guide Network (now Pop TV). Lisa and Kelly Kahl's friendship goes back several years. Lisa is also very good friends with Kelly's wife, Kim Kahl. On October 19, 2013, Kelly Kahl flew with his wife Kim to Detroit, Michigan to personally attend Lisa Germani's wedding. Paul Adler (Title: SVP of Original Programming, TV Guide Network (now Pop TV) also flew to Detroit to attend.

Interestingly, On November 17, 2014, David Mandell cancelled TV Guide Network's FCC License. The network would not rebrand into POP TV until Mid-January 2015. The network still had 7 more weeks before the rebrand would occur and TV Guide Network operated with a cancelled FCC License. Coincidentally, David Mandell's



letter of cancellation to the FCC coincides with the exact time that I reached out to go "Civil Rights" attorney shopping. (See Exhibit #7: my letters and emails to Norman Siegel and David Mandell's Letter to the FCC).

By denying me my contracted right of arbitration, David Mandell is taking revenge against me and is inflicting antagonistic, unfair treatment of me that is discriminatory, and below the belt. I AM SIGNED TO GO TO ARBITRATION WITH LIONSGATE! Ask any of the other 60 plus TV Guide Network employees who emerged with me from Randy Young's February 6, 2009 "New Hire" meeting as Lionsgate's newest employees! I and all of them are signed by Lionsgate's "new hire" form which we all filled out while we were in the same room, to arbitrate any claims whatsoever that arise during or after our employment has concluded by going through JAMS Arbitration, Lionsgate's internal grievance procedure.

## **B)**

**Date:** February 5, 2014

**Action:** Threatened in Writing, "Cease & Desist"

**Name and Title of Person Responsible:** David Mandell, General Counsel & Executive Vice President, TV Guide Network (now Pop TV)

### **Details:**

David Mandell discriminated against me with his "Cease & Desist" email which immediately barred me from having any contact with my former co-workers. It also barred me from having any further contact with Lionsgate's Human Resources Department, and from making any contact to Lionsgate Executive Management.

David Mandell's "Cease & Desist" was a new intimidating retaliation action that immediately interfered with my prospects for new employment. I could not contact my former bosses and could not make contact with my former co-workers for references. I could not network or even check-in with former co-workers to spread the word that I was job hunting.

Today its 19 months later and I am still unemployed, I've been ineligible for unemployment insurance and I have survived by using up my personal savings account and there's very little left. Just two days ago (on September 16, 2015) at an administrative hearing in Brooklyn, New York, I was approved for SNAP (Supplemental Nutrition Assistance Program Food Stamps). Also- I am enrolled in free Obamacare for my medical insurance through New York State's Health Insurance Exchange.

#175



Today its 19 months later and due to David Mandell's "Cease & Desist" email I still am barred from making any contact with former bosses and co-workers, some who are in new companies who have the power to recommend, and possibly hire me.

Since receiving David Mandell's "Cease & Desist" I have suffered huge economic loss of income, have suffered career damage, and social damage, all because Mandell is trying to keep me quiet about uncorrected criminal activity that remains in place at TV Guide Network. Activity that is contrary to Federal, State and Civil Rights laws.

I am an American citizen. Don't the rights in the United States Bill of Rights and in the United States Constitution apply to me? How is it possible that David Mandell is able to squash my Freedoms and Civil Liberties?

**C)**

**Date:** January 5, 2014

**Action:** No Response to me!

**Name and Title of Person(s) Responsible:** Richard Prell, Compliance Officer, Lionsgate

**Details:**

In January 2014, I needed to exercise my civil rights with Lionsgate's Compliance Officer. I was still the victim of satellite surveillance via the "always on" satellite broadcast. The Lionsgate Employee Manual has a policy that defines how complaints about criminal activities and wrongdoing at Lionsgate are supposed to be handled. Yet, despite all of my consistent complaints, despite the frequency of my complaints and despite the severity of my complaints, Richard Prell just kept me a prisoner of the wrongdoing and I felt discriminated against by Richard Prell because I was making formal complaints. Richard Prell would not respond to me at all. He didn't even have a member of Lionsgate's Human Resources Department get in touch with me.

Furthermore, In January 2014, I made a series of reports to Ethicspoint.com, - Lionsgate's official online compliance portal where I detailed criminal activities that were taking place at Lionsgate's TV Guide Network. No one from Lionsgate or Ethicspoint.com responded to me or got in touch with me. This was outrageous conduct to me due to the frequency and the severity of my reports. Again, I felt totally discriminated against.

The web address for Lionsgate's online compliance portal is:

<https://secure.ethicspoint.com/domain/media/en/gui/5660/index.html>

Prior to my use of the Ethicspoint online portal, I made a telephone call to Ethicspoint's toll free number to make a verbal report and the name of the intake

manager who I spoke to was: Towanda. I made this oral report on Wednesday evening, December 25, 2013 (Christmas night).

**D)**

**Date:** May 7, 2013      **Action:** No Response to me!

**Name and Title of Person(s) Responsible:** Richard Prell, Compliance Officer, Lionsgate

**Details:**

When I received no response to letters and emails that I sent to Jack Carey (SVP, Operations of TV Guide Network), I exercised my rights by typing up an official compliance complaint letter full of charges about company wrongdoings and rights violations that existed at Lionsgate's TV Guide Network.

As a former employee I felt that I was still bound to follow the official company procedures set forth in the Lionsgate employee manual which instructed me to make a report to Richard Prell, Compliance Officer.

I made 4 different official telephone calls to Richard Prell to discuss the May 7, 2014 letter that he received from me. On my first call, I reached Richard. His response to me was that he had to quickly run off to attend a meeting and that he'd call me back. I waited and waited and he never called me back!

I tried again to call him, and left a message reminding Richard that I needed to talk with him. As the days went by, after leaving a total of 3 different official telephone messages for Richard, he never called me back. He never wrote any response back to me.

My official compliance letter and complaints to Richard were met with no response. I felt and still feel that Richard Prell discriminated against me and that his retaliation to me was that he wasn't going to call me back for making official reports that Lionsgate was in non-compliance with Federal, State, Local and International Laws.

**E)**

**Date:** The Month of December 2012      **Action:** Failure to Investigate my Worker's Comp Claims. Failure to interview any of my witnesses, Failure to correct misuse of satellite and broadcast operations machinery misconduct by The Hartford (Lionsgate's Worker's Compensation Insurance Company.)

**Name and Title of Person(s) Responsible:** Lindsay Bostrom, High Exposure Claim Consultant, The Hartford.com Contact info: Email: [Lindsay.Bostrom@TheHartford.com](mailto:Lindsay.Bostrom@TheHartford.com) Telephone #: 866-401-0222 ext. 2304199

My Two Claim Numbers:

Claim # 1: YMH91502C

Claim # 2: YMH91711C

Details:

Lindsay Bostrom, the case manager at The Hartford Insurance Company, Lionsgate's Worker's Compensation Insurance vendor, herself never worked in TV broadcasting and was uneducated about workplace misuse of broadcasting technology, specifically the misuse of satellites and she and her team didn't want to investigate. This left the satellite situation in place. In late November 2012, I filed my first worker's comp claim with Lionsgate's Human Resources Department which they sent to The Hartford. In December 2012, I was interviewed by telephone by Lindsay Bostram, the case manager and my interview was recorded. (I gave permission). Soon after, The Hartford sent me to two different Worker's Compensation medical doctor appointments.

But, outrageously, The Hartford did not want to contact any one of the names of my former co-worker witnesses which I provided to the Case Manager with witness telephone numbers. The Case Manager did not want to do a workplace inspection and/or site visit/investigation of TV Guide Network's Tulsa, Oklahoma based broadcasting facility. This was of no interest at all to them or possibly they ran the idea by Lionsgate and Lionsgate turned it down.

In December 2012, I was in very bad shape from the satellite monitoring surveillance situation that I remained imprisoned by so I made my 2<sup>nd</sup> Worker's Comp claim to Lionsgate's Human Resources Department which was immediately turned over to The Hartford to handle. The Hartford was still processing my first claim and The Hartford immediately turned this 2<sup>nd</sup> Worker's Comp claim down. Their excuse was that I was no longer an employee of Lionsgate and that The Hartford had no proof as an insurance company of any science that would allow broadcast operations equipment (including earth stations and satellite beams from transponders) to broadcast direct to me. Again, The Hartford did not contact any of my former co-worker witnesses who were experts in this area. Again, there was no site visit to TV Guide Network's broadcasting facility in Tulsa, Oklahoma and the Case Manager at The Hartford (Lindsay Bostrom) who was clearly uneducated about broadcasting, did not even want to call any industry experts to learn more about broadcasting operations machinery, satellites and the technical architecture that has ushered in an era of new risks to broadcasting companies like Lionsgate.

A whole new era of employee negligence and employee misconduct has begun from new advances in broadcasting technology. New advances in broadcasting operations machinery and satellites. The Hartford Insurance Company had no interest in this new area that they should have paid attention to. The Hartford could have been the leaders in this new area of workplace violence and workplace misconduct had The Hartford done a better investigative job on my Worker's Comp claims.

As I have stated above, in my original telephone interview call (which was recorded) with Lindsay Bostrom, the Case Manager, I urged her to reach out to my former co-worker witnesses. Any one of whom could have personally explained how TV Guide Network's owned and leased broadcasting operations machinery was purposely rigged up to commit satellite assaults, privacy rights invasion, electronic monitoring of me and the science that allowed my co-workers to broadcast to me

## F)

**Date:** May 19, 2011

**Action:** Falsified ADEA Termination Document

**Name and Title of Person(s) Responsible:** 1) Lionsgate's Human Resources Department. My termination package was sent to me by Patricia Ho from Lionsgate Human Resources Department but I don't know who actually prepared my ADEA document. Note: I have heard that Lisa Germani (Director, Talent Department, TV Guide Network) emailed the list of who currently worked in her department to Human Resources.

### Details:

It was my final day of employment with Lionsgate. I received from Human Resources by UPS (United Parcel Service) an "employee termination packet." Included in my packet, was a one page black and white document that had the TV Guide Logo on top that someone printed from their computer. It was an official required ADEA (Age Discrimination In Employment) document that the company was required to include, perhaps due to Federal Law.... and there were a couple of BIG problems with this ADEA required document.

### The Problems with the ADEA required document were:

Problem #1: I was over 50 years old and the document showed me that Lionsgate was favoring the company's younger employees by keeping them employed instead of me. Especially in my department, The Talent Department.

Problem #2: The ADEA required document was not an accurate accounting of who actually worked in my department at TV Guide Network at that time. For instance in my department, a young twentysomething Talent Department Assistant (named Nell Lanman) was somehow completely left off of the document.



Problem #3: Lionsgate was terminating my employment but they chose to keep the employment in place of my 45 year old department co-worker. This 45 year old co-worker would have been named Fernita Wynn!

The very big problem here was that Fernita Wynn's employment at TV Guide Network had actually ended some 10 months earlier. Fernita's final day with Lionsgate took place on either Tuesday, July 20, or Wednesday, July 21, 2010. Fernita resigned to take a job in a different company. In May 2011, Nancy Coleman's Lionsgate Human Resources Department is terminating my employment with an official ADEA document sent to me and Lionsgate is keeping Fernita Wynn employed when Fernita doesn't even work there and had not worked there in just under 10 months! It made no sense! It was sloppy business and again it was just another cunning and skillful tool in Nancy Coleman and Lisa Germani's arsenal of retaliation and discrimination against me.

Problem #4: I know that Lionsgate is an "At-Will" employment company. But in both my termination packet and in the telephone call that took place to me in early May 2011 where Paul Adler (V.P of Programming) and Eileen Kohler of Lionsgate's Human Resources Department told me that I am being terminated, there was no other information given to me regarding the factors that the company used to pick me for termination. I was a shining star of the company, I was always thanked for all of the good work I did, Thanked for all of the big stars that I booked. I was always thanked for how much I cared about my work, I was thanked for always delivering, for constantly exceeding expectations. I was a doer! A difference maker! I delivered for the company each and every day. My termination made no sense! Why was I selected for layoff? Daily, I was one of the employees on the front line of the company delivering success!

## G)

**Date: May 4, 2011**      **Action:** I was notified that my employment was being terminated. My last day would be on 5/19/11 and my company email was immediately viciously and maliciously turned off so I could not reach out to co-workers and management to protest my termination and so I could not complete my job duties for my final two weeks of work.

**Name and Title of Person(s) Responsible:** Lisa Germani (Director, Talent Department), Michael Nalepa (Former employee who no longer worked for the company but had access, permission, and who was ratified by Lisa Germani to use her email account) and Paul Adler (VP of Programming)

### Details:

My company email was turned "Off" immediately after I received a telephone call that May 19, 2011 would be my last day as an employee of Lionsgate. Immediately, my

email was shut-down, my password had been changed and I was locked-out of the system, not able to access my company email account at all.

Here, I was still a Lionsgate employee for two more weeks. My last day would be May 19<sup>th</sup> and I needed my email in order to be able to do and finish my work for the company. Without my email my business contacts were not able to contact me, my co-workers couldn't email me about projects that we were in the middle of working together on. I was immediately erased from the company although I still worked there for two more weeks. To my co-workers and to my business contacts this made me look irresponsible. Suddenly to the world, it looked like my employment had been abruptly terminated for misconduct or cause due to the way this was handled.

I called Paul Adler on the telephone and begged Paul to get my email turned back on. It wasn't fair, I was still an employee who had two more weeks of work to do.

On May 4, 2011, Paul Adler never called me back about my email with any updates on any efforts he made to get my email turned back on. And it seemed that he didn't care if my work got finished or not. When I sent an email from my home email address to my Lionsgate email address, I received an automated email response back to my home email address that had quickly been created, that was being sent to anyone who emailed my work address. This automated response email stated that Tricia Daniels no longer worked for the company and to please contact Lisa Germani (via Lisa's email) instead.

I tried a few more times to reach Paul Adler to try to get my email turned back on. Once, I even spoke to his assistant Kara Howland and begged her to find Paul because I needed my email turned back on for the remainder of my employment. Paul never called me back.

My email never got turned back on. I never even got to come back to the office to pack up personal items that remained in my workplace cubicle and desk.

Sadly, to this day I have never recovered from the fact that I was not allowed to say "Goodbye" to my co-workers.

## H)

**Date:** May 4, 2011      **Action:** Termination Notification. I was notified that I was being terminated on 5/19/11 and during my telephone conversation with Eileen Kohler (Human Resources, Lionsgate) I refused to listen to the rest of her lay-off dialogue and I demanded that Nancy Coleman is my Human Resources representative and that if I am to be fired that Nancy Coleman is the person who needs to do that. I was denied any type of follow-up conversation that would allow me to further protest and challenge my termination.

**Name(s) and Title(s) of Person(s) Responsible:** Paul Adler (VP of Programming), Eileen Kohler (Human Resources, Lionsgate)

**Details:**

Paul Adler and Eileen Kohler (who reported to Nancy Coleman) placed a joint telephone call to me where they jointly told me that my employment with Lionsgate will be ending. That my last day of employment would be two weeks later, on May 19, 2011.

Paul immediately jumped off the line and left me to speak to Eileen who I had never had any contact with prior to this phone call. During my conversation with Eileen there were no reasons given to me why I was being let-go. While we were on the phone together I stood my ground and I sharply told Eileen that I am not supposed to be terminated and that there is a mistake and I want it to be immediately fixed. I demanded that Eileen have her boss, Nancy Coleman (EVP of Human Resources) call me back or have Scott Woodward call me back. (Scott's title was Executive Vice President of Production and Programming). Scott was my longtime boss (from 2004 through early 2011 until Nancy Coleman did a switcheroo and made Lisa Germani my direct supervisor in February 2011.)

During my conversation with Eileen, I repeatedly told her that she and Paul Adler both did not have the authority to terminate my employment. I stood-up to Eileen and held my ground that only Nancy Coleman or Scott Woodward would be able to terminate me. I also sharply told Eileen that I had more than satisfied Nancy Coleman's Fitness-for-Duty demands made on me just a few months earlier (in January 2011 and in February 2011) and I want to talk to someone higher-up about this. Eileen said that, someone from the company would call me back. But as the minutes and hours went on, No one called me back from Lionsgate, not Eileen, not Nancy Coleman, not Scott Woodward, not Paul Adler, not even Lisa Germani to talk to me about my termination. Here my employment was being taken away without any explanation. No reason was cited by Paul Adler and Eileen Kohler cited no reason.

**I)**

**Date:** either March 25, 2011 or March 26, 2011 **Action:** I was not allowed to complete my job.

**Name and Title of Person(s) Responsible:** Heather Case (Senior Talent Booker)

**Details:**

During the last week of March, I booked LaToya Jackson and Star Jones to both join us for in-studio tapings on our "Hollywood 411" show. These were great bookings for us, especially LaToya who pre-agreed to discuss her late brother, Michael Jackson with us on-air.

Both LaToya and Star were going to be joining us for in-studio interview tapings on the same afternoon. The day before their in-studio interview tapings, in a malicious



and outrageous miscarriage of her authority, co-worker Heather Case informed me that I was not allowed to attend the taping of these two A-List guests that I booked.

When I reached out to Heather Case to tell her that I would not stand for this treatment, Heather emailed me back that she checked with Eileen Kohler of Lionsgate's Human Resources Department and that I am not allowed to attend these interview tapings because I 'needed to satisfy the requirements and orders issued to me by Lionsgate's Human Resources Department.'

Heather Case was junior in position to me. Junior as a Talent Booker to me, and I did not report to Heather Case in any way. This was new a new discrimination and punishment. I reached out to Lisa Germani (Heather Case's boss) by email. Lisa was also my current boss at this juncture and I told Lisa of my displeasure. Please note that at this juncture I was still not allowed to visit the office, not allowed to pick up my mail and that I had not been allowed back in the office at all since I got punished and thrown out of the office on October 15, 2010 by Nancy Coleman on a day when I reported company wrongdoing. Earlier that same day, October 15, 2010 is when I stood up to Lisa Germani by confronting her in her office, where I complained to her about her harassment campaign on me and where I ordered Lisa to STOP her discriminatory, unjust treatment of me. (See Letter #O below)

**J)**

**Date:** February 11, 2011 through February 14, 2011 **Action:** My 2nd Fitness-For-Duty Examination.

I was supposed to be able to return to the office after my 1<sup>st</sup> Fitness-For-Duty Exam that took place a few weeks earlier, but Nancy Coleman took a 2<sup>nd</sup> attempt at trying to put me on phony disability!

**Name and Title of Person(s) Responsible:** Nancy Coleman, Lionsgate EVP of Human Resources, Lisa Germani (Director, Talent Department) and Michael Nalepa (Former employee who no longer worked for the company but had access, permission, and who was ratified by Lisa Germani to use her email account)

**Details:**

I took my 2<sup>nd</sup> Nancy Coleman ordered "Fitness For Duty" exam on February 11, 2011. And just like my first fitness for duty exam, taken just a few weeks earlier on January 21, 2011, Dr. David Zakin wanted me returned to the office by Nancy Coleman.

During my second meeting with Dr. Zakin, on February 11, 2011, he seemed visibly upset at Nancy Coleman for sending me back to him a second time. I was mentally fit the first time and during my first visit, I was not a candidate for disability.

Dr. Zakin had spent 3 hours with me during my first appointment just weeks prior and after that first visit he certified me to return to the TV Guide Network offices. But in



what I deemed as another punishment to me, Nancy Coleman did not return me to the office and still kept me on 'work stoppage' and 'leave of absense.'

During this second visit to Dr. David Zakin, Dr. Zakin was clearly upset at Nancy Coleman for sending me back to him and he discussed with me his plan, which was, that he was going to instruct Nancy to leave me working at home for just two more weeks and then return me to the office. Dr. Zakin felt that there was nothing wrong with me and he felt that his plan would work with Nancy Coleman.

Stunningly, Nancy Coleman after this 2<sup>nd</sup> appointment still would not return me to the office. Nancy kept me telecommuting from home. However, after this 2<sup>nd</sup> appointment with Dr. Zakin, Nancy was forced to remove her work stoppage order and I was able to resume my talent booking duties for the company. (Nancy kept me on work stoppage from November 30, 2010 until mid-February 2011.)

But although Nancy was lifting her 'work stoppage' there was a new punishment that Nancy issued to me. This new punishment to me was that Nancy suddenly made Lisa Germani, my tortfeasor, my new direct supervisor and my only supervisor. According to Nancy, I was not to report to anyone other than Lisa Germani.

It was unfathomable to me that Nancy would have forgotten that Lisa Germani was the one who started all of the trouble for me with Nancy Coleman in the first place. For, on October 15, 2010, it was when I directly confronted Lisa Germani in her office and spoke up to her by telling Lisa to stop her harassment campaign on me that Lisa instead of stopping decided to falsely and maliciously try to get me fired for committing sexual harassment which I did not do.

It was a situation that Nancy Coleman refused to investigate from October 2010 through December 2010 and suddenly in February 2011, Nancy Coleman was making Lisa Germani my immediate supervisor. How could Nancy inflict this new punishment on me? It made no sense.

When Lisa became my supervisor, I still was not allowed to visit the office at all. I was not allowed to meet the new younger group of female employees who joined our company in February 2011 when our company wanted TV Guide Network to appeal to a younger female audience. In February 2011, not only did TV Guide Network's programming start to change but so did the ages and sexes of our employees. Gone from the regular payroll were the openly gay male employees (named: Michael Nalepa, and Tom McMahon). Even our openly gay male freelance producer (named David Park) was not getting hired with the regularity that he had been hired with, back during Calendar year 2010.

It was clear to all that our network was attempting to grow younger not just in programming but also in style, graphics and in overall on-air attitude.

As my new direct supervisor Lisa Germani told me repeatedly that these new female employees don't want to receive any phone calls, don't want to receive long emails or anything like that. Lisa instructed me to make all of my story pitches, run guest bookings ideas, etc. through her.

Daily, Lisa kept reminding me not to call and not to send emails to our new group of female employees. Instead, I was to send all of my pitches and status reports directly to Lisa Germani.

**K)**

**Date:** February 11, 2011 through the remainder of my employment

**Action:** "The Company Wants You To Take Psychotropic Drugs!"..... Further Retaliation from Nancy Coleman when her new attempt to put me on false disability didn't work out for her.

**Name and Title of Person(s) Responsible:** Nancy Coleman (EVP, Human Resources, Lionsgate) and Lisa Germani (Director, Talent Department)

**Details:**

When she made Lisa Germani my new direct supervisor, Nancy Coleman and Lisa together clearly prevented my future success at Lionsgate. It was like Nancy and Lisa had teamed up together to keep me down, to micromanage me, to prevent me from having any relationships with co-workers, and to keep me isolated, working from home.

Suddenly, Lisa Germani as my new supervisor prevented me from having the same responsibilities that I had for the company prior to Nancy Coleman's work stoppage.

But also just after my second visit to Dr. David Zakin, for Fitness-for-Duty exam #2— Nancy had a new way for getting even with me because Dr. David Zakin found me to be of sound mind and because Nancy didn't win in her attempt to get Dr. Zakin to put me on a mental health disability that she so wanted me to be on.

Nancy's new way of getting even with me was to have a few telephone conversations with me where Nancy instructed me quote- "The company wants you to take psychotropic drugs." Huh? That's not what Dr. David Zakin stated to me at all.

In every telephone conversation that I had with Nancy from this day forward to the end of my employment at Lionsgate, Nancy kept telling me "the company wants you to take psychotropic drugs." She also instructed me to go see a doctor who would prescribe psychotropic drugs to me.

Nancy's repeated dialogue about psychotropic drugs was just crazy! And Nancy still refused to return me to the office.

**L)**

**Date:** January 21, 2011      **Action:** Fitness For Duty Exam #1- Nancy Coleman tried to have me put on what would have been False Disability.

**Name and Title of Person(s) Responsible:** Nancy Coleman (E.V.P. of Human Resources, Lionsgate)

**Details:**

On January 21, 2011, I went for a three hour fitness-for-duty exam with Dr. David Zakin that Nancy Coleman ordered me to go for. Nancy even had Lionsgate pay Dr. Zakin to examine me. It was a mental health exam that had two parts- an oral interview and a written multiple choice Q&A test that followed.

From the second that I walked in, it was clear to me that Nancy was trying to have Dr. Zakin put me on some sort of false disability. It was preposterous that Nancy would try to do this to me and it seemed unlawful to me that Nancy was trying to get me placed onto the State Disability Benefit System as well as onto Lionsgate's Disability Insurance provider's systems until I'd possibly need to make an application for Social Security Disability.

It was also absurd to me that I, a talent booking employee, who was a superstar at the company had to go through a fitness-for-duty exam. I wasn't a policeman who carried a gun, I wasn't a fireman who in the course of duty saves people's lives, I was a mere office worker. As absurd and as embarrassing as I found it to be I had to follow Nancy's orders and attend when my standing up to her through two telephone calls didn't work. On those calls, she just wouldn't budge.

When I went for this first three hour meeting with Dr. David Zakin, it was humiliating to me because a group of my co-workers were aware that Nancy Coleman senselessly was able to abuse her power to do this injustice to me.

Perhaps it was Nancy's way of wielding her own power? Nancy was the chief Human Resources Officer at Lionsgate, Nancy had held her position there for many years. Perhaps these intimidation techniques of Nancy's were honed by her through the years? Perhaps these intimidation techniques really worked for her and kept company employees threatened that if you stand up to Nancy Coleman, you could lose your employment, lose your company benefits, lose any chance of future promotion, and



as I was learning firsthand, you could also get put on some sort of phony mental health disability where you'd be taken off the regular company payroll.

A few days went by after the conclusion of this first fitness-for-duty exam and I knew that I exceeded Dr. David Zakin's expectations. He himself had told me so at the conclusion of our appointment. He even handed me his business card in case I knew of anyone who needed his services. Dr. Zakin that day was clearly looking for me to recommend some new clients to him, but he was not looking to have me as his client. I WAS FIT!

So a few days after my appointment when I didn't hear anything from Nancy Coleman. I was still on 'work stoppage' which could also be called 'leave of absence' from the company. Dr. Zakin had cleared me days earlier to return to the office. I was excited that I'd be able to resume my employment and I called Nancy Coleman to check in with her. When I spoke to Nancy by phone she told me to enjoy my last few days of working from home because I am going to be returning to the office, sometime next week.

Nancy continued to tell me that there have been some changes at TV Guide Network, that Michael Nalepa from my department no longer works there, that we also have a new Executive Producer and it seemed that I was finally going to be unpunished. But the very next time that I spoke to Nancy by phone something had changed on her side. She instead wanted me to go back to Doctor David Zakin and get a 2<sup>nd</sup> Fitness-For-Duty Exam. I later learned from co-workers that this was because Lisa Germani (Director of the Talent Department) did not want me back in the office. Lisa wanted my employment terminated.

By late January 2011, another crazy thing happened, without any notice to me whatsoever, my paychecks stopped arriving. Allegedly, a group of my co-worker tortfeasors took me off of Lionsgate's payroll. This group also removed my name and contact information from the company's master employee telephone list.

I reached out to Nancy Coleman immediately about this as I was outraged and I needed this corrected. I was still a company employee. My name and telephone contact numbers and email address should be on the master employee telephone list! Also- I had not received my January 2011 paychecks.

I do have one compliment to make about Nancy Coleman. Which is, that Nancy immediately got my 2 missing January paychecks cut and sent to me. I was supposed to receive these two paychecks during the previous couple of pay periods. On February 7, 2011, Nancy sent these paychecks to me at home, by UPS (United Parcel Service) next day air delivery.

**M)**



**Date:** December 16, 2010 **Action:** Nancy Coleman would not let me meet with her.

**Name and Title of Person(s) Responsible:** Nancy Coleman (E.V.P, Human Resources, Lionsgate)

**Details:**

On December 16, 2010, I called Nancy Coleman by telephone. Nancy was in her Lionsgate office and I was at home- still on her work stoppage/leave of absence orders. I was not allowed to do any work for Lionsgate until I visited with Dr. David Zakin to take a "Fitness-For-Duty" examination.

On this day, during two different telephone calls I insisted to Nancy that I needed to come over to meet with her in her office. I wanted Nancy to see that I was "fit-for-duty," I wanted Nancy to drop her Dr. David Zakin routine, I wanted Nancy to see that she is still punishing me who does not deserve to be punished, I wanted for Nancy to restore my employment duties, and I wanted to tell Nancy face-to-face more about the criminal activities that were still taking place at Lionsgate's TV Guide Network which still needed correcting. I stood my ground with Nancy and insisted she allow me to meet with her that day. I told Nancy that I wanted to 'name names' to her and sit with her and tell her details so she'd correct her discrimination of me.

Nancy Coleman, on this day refused to let me meet with her. She refused to meet with me for even a very short meeting. Nancy told me that she was getting ready to go on vacation and that she had no time to meet with me. Next, I pressed Nancy about meeting with her the following day, to which Nancy replied that she was only going to be working for a half day on December 17, 2010 as she was going on vacation and that she had no time to meet with me.

**N)**

**Date:** November 30, 2010 **Action:** We're Putting You On Leave of Absence and Work stoppage

**Name and Title of Person(s) Responsible:** Lisa Germani (Director, Talent Department), Michael Nalepa (Talent Department Assistant who had access, permission, and who was ratified by Lisa Germani to use her email account) and Nancy Coleman (E.V.P, Human Resources, Lionsgate)

**Details:**

On the afternoon of November 30, 2010, from out of nowhere a strange email from Nancy Coleman arrived to me. In her email Nancy put me on a 'Leave of Absence' and issued a work stoppage order to me. In her email Nancy stated that I needed to get a "Fitness- For- Duty" exam. I had just finished up details for my Johnny Depp/Angelina Jolie movie junket booking (for their film "The Tourist") when Nancy's email arrived.

See Exhibit #12 for Nancy Coleman's email to me.

In my email reply back to Nancy Coleman, I stood up to her and I opposed this newest discrimination against me. (See exhibit #12). After I sent my email back to Nancy where I refused to obey her "Leave of Absence" and "work stoppage order," because I believed that Nancy once again was discriminating against me with this action, I also copied and forwarded Nancy's email along with my response to Lionsgate's Chief of Staff, named Heather Somaini and I cc'd Jon Feltheimer (Chief Executive Officer of Lionsgate (See exhibit #12)

On Tuesday, November 30, 2010, Nancy put me on a four week leave where I'd be paid but where I wasn't allowed to perform any work for the company. Nancy made her reasoning for this clear in her email to me.

Some of the words in Nancy's Tuesday, November 30, 2010 "work stoppage email" to me were:

-----  
Thanks for your email. We've checked with staff members and no one is aware of the various issues you identify below including the feeds you reference. Also, as many employees have mentioned to you, Hollywood 411 is not cancelled and is in budget through 2011. Several of your recent emails give us very significant concern.

As we discussed previously, it has been reported to us that there have been incidents at the office where you engaged in behavior that has frightened your coworkers and disrupted the workplace. Effectively immediately we are placing you on leave of absence and you are not to perform any work for TV Guide. Before we can permit you to return to the office, we request that you take a fitness for duty examination to ensure that it is safe for you to return to the office. Please schedule your exam with Dr. David Zakin at 310-281-7028.

-----  
Strangely, on November 30, 2010 when I received this "work stoppage" email from Nancy Coleman, I had not even seen my co-workers for weeks and I had not been allowed to even visit the office for weeks. Strangely, Nancy Coleman had outrageously forgotten that on October 15, 2010 she herself ordered me to work from home during our 5:15pm Conference Room meeting. I had been working from home since that meeting.

On November 30, 2010 there would be no possible way that any of my actions could have frightened my office co-workers. Here again, it seemed to me that Nancy who was scatterbrained was again self-governing herself, and again Nancy was punishing me for Lisa Germani's October 15, 2010 very public sexual harassment "Lick My Dick" comment made to Michael Nalepa. When I received Nancy's 'work stoppage email' it was unfathomable to me.



Michael Nalepa during the first week of August, 2015, confirmed to me via the "always-on" satellite broadcast that the story behind Nancy's Coleman's November 30, 2010 "work stoppage email" to me is that Lisa Germani wanted my employment terminated. Michael Nalepa, who had been ratified by Lisa Germani to reach out to Nancy Coleman via email posing as Lisa Germani, admits that he himself also wanted my employment terminated because "the live feeds" (aka-the "always on" satellite broadcast that started on either August 24, 2010 or on August 25, 2010) had not worked out that way that Lisa Germani intended. Michael Nalepa can be asked to share more information on this with Lionsgate and with the EEOC.

Michael Nalepa can also discuss a couple of other things mentioned in Nancy Coleman's email to me.

1. When Kristan Giordano (Executive Producer of TV Guide Network's "Hollywood 411" show) was not responding back to me via email or via telephone regarding if she wanted brand new movie junket interviews with movie stars including: Robert DeNiro, Ben Stiller, Owen Wilson, and Jessica Alba, I sent one or two emails to a co-worker where I inquired about the status of our "Hollywood 411" program as I was told by other co-workers that our "Hollywood 411" show had not been taping new episodes since mid-October. I didn't know if our "Hollywood 411" show, an expensive show to produce was still shooting new episodes or not. It made no sense that Kristan would not be jumping for joy that I could get these interviews for her.

1A. Michael Nalepa has since explained to me that he and Lisa Germani, purposely reached out to Nancy Coleman (EVP, Human Resources, Lionsgate) on November 30, 2010 because when I questioned about the status of our "Hollywood 411" show, they saw a new opportunity to file a phony complaint about me which they hoped would result in Nancy terminating my employment. Remember, I did nothing wrong. I'm telecommuting because of Nancy Coleman's October 15<sup>th</sup>, 2010 orders to me to work from home. It's more than a month later and I was not allowed to visit the office, not even allowed to receive workplace mail being sent to me, and in her violation of duties as an Executive Producer, Kristan Giordano was not giving me the answers that I need so daily, even from home, I could keep delivering success for Lionsgate and for TV Guide Network.

2. Re: the subject line of my email-"Laura Nyro/Malibu Beach Girl/David Geffen's Will"- Michael Nalepa can explain this too. I had been reporting "the always-on" satellite broadcast to Nancy Coleman for several days. My TV Guide Network co-workers were broadcasting to me around the clock in teams. Someone was actually scheduling their broadcasting shifts. On their broadcasts, I was referred to constantly as "Laura Nyro." Lisa Germani was referred to constantly as "Malibu Beach Girl" and my co-workers were playing out their "David Geffen Will Game" because they thought that entertainment mogul David Geffen was going to leave me a large sum of money in his "Last Will & Testament" and Lisa Germani with help from Michael Nalepa, set out to destroy my life and to

#190

devise a way where they could somehow shift any inheritance that David Geffen would possibly leave to themselves. (It was CRAZY!)

O)

**Date:** October 15, 2010

**Action 1:** Before Lunch, I confronted and stood-Up to Lisa Germani in her office and point-blank told Lisa to stop her harassment campaign against me.

**Action 2:** After Lunch, in retaliation to me, Lisa made up phony charges that I committed Sexual Harassment when it was really Lisa Germani who committed the Sexual Harassment and then reported me for it to Lionsgate's Human Resources Department in an attempt to ruin my employment.

**Action 3:** Instead of believing me, Nancy Coleman threw me out of the office and demoted me into a telecommuting worker. Nancy ordered me to work from home and not return to the office.

**Name and Title of Person(s) Responsible:** Lisa Germani (Director, Talent Department), Michael Nalepa (Talent Department Assistant who had access, permission, and who was ratified by Lisa Germani to use her email account) and Nancy Coleman (E.V.P, Human Resources, Lionsgate)

**Details:**

Before lunch, I confronted and stood up and complained to Lisa Germani in her office about her discriminatory treatment of me. I had had it with her harassment campaign against me, I had had it with her satellite surveillance—the "always on" satellite that was assigned to monitor me and commit privacy rights invasion of my life. I wanted Lisa to just stop it! When I spoke to Lisa, I showed her how upset I was at her for what she had been putting me through. I told her to STOP! Then I went to get lunch.

Just after lunch I had no idea that Lisa Germani and Michael Nalepa had been plotting about how to retaliate against me for standing up to Lisa.

Around 5:15pm, I received a telephone call from Nancy Coleman (E.V.P. of Human Resources, Lionsgate). Nancy whose office was located in Santa Monica, CA had made a special journey over to our Hollywood offices on this day. Nancy wanted to meet with me in one of our conference rooms. I told Nancy that I'd be right there to meet with her. Nancy was Lionsgate's top Human Resources official.



During our conference room meeting Nancy seemed scatterbrained and didn't fully verbalize at first why she summoned me. Nancy started asking me questions about some proactive reports that I recently made. One of those reports was that my company email account had been hacked. This was of concern to me because as a Lionsgate employee I dealt with a lot of confidential information. Another reason that this hacking was of concern to me is because of Lionsgate's "New Hire" form (the very same form that contains the JAMS Arbitration clause), all new Lionsgate employees needed to sign and date a clause within the "new hire" form that we understood Lionsgate's company computer policies.

Another report that I had recently made to one of Nancy's Human Resources team (named Rochelle Kasten) who was helping Nancy with Human Resources duties for TV Guide Network was that our office lighting had become uncomfortable for me again. Nancy said that she was working on this facilities issue already for me.

While I was sitting there alone with Nancy, I answered her every question that I was asked. And then suddenly, Nancy did a 360 degree turn and opened her closed file. Nancy suddenly had become uncomfortable and her whole demeanor changed. Next, Nancy angrily asked me quote—"Did YOU SAY, DID YOU SAY...."

She kept stumbling on "Did You Say.....Did You Say...but she would not complete her sentence. I had no idea what she was referring to at all. I told Nancy to talk to other employees to see what they'd be able to tell her.

Immediately Nancy decided to punish me. At the conclusion of our unscheduled meeting, Nancy ordered me to work from home beginning immediately and not to return to the office. Nancy's voice was now raised and Nancy also ordered me to "get a consultation"—although she did not even explain further about what type of consultation she wanted me to get.

Again, I stood up to Nancy and told her to talk to other employees. I had done nothing wrong. Other employees would have been able to back that up. Nancy did not care. She showed me that her mind was made up. Our meeting was then over. When I left our office that day to begin my "Work From Home" chapter, I had no idea that for the rest of my employment that I'd never get to return to our office, not even get to clean out personal items from my desk. Also- that day, I had no idea of the next chapters of discrimination, bias, and hula-hoops that Nancy Coleman was about to put me through (leave of absence/forced work stoppage, two fitness-for-duty Doctor's appointments, career damage and ultimately humiliation then termination).

Around August 3, 2015, I newly learned from Michael Nalepa while I was writing up my JAMS Arbitration Demand the details of why Nancy Coleman threw me out of the office on October 15, 2010. Michael was broadcasting to me on the "always on" satellite broadcast and Michael who is the most honest person that you'll ever meet, revealed that Lisa Germani with help from Michael intentionally concocted and filed a phony "Sexual Harassment" report to Lionsgate's Human Resources Department

against me. This phony report was filed by Lisa an hour or two after I confronted her and stood up to her in her office on October 15, 2010.

Michael Nalepa revealed that on October 15, 2010, both he and Lisa together figured out that Lisa's ongoing satellite harassment campaign on me did not work out the way that she wanted it to and Lisa Germani and Michael Nalepa wanted my employment terminated immediately. They together created a phony sexual harassment charge against me to intentionally ruin my Lionsgate employment.

Around August 3, 2015, Michael also revealed to me that during my meeting with Nancy Coleman, the words that Nancy was not able to utter to me were quote- "Lick My Dick." Sadly, had Nancy said these words to me, and completed her sentence -- "Did You Say...Lick My Dick?" I would have been able to tell Nancy that it was Lisa Germani who said those words loudly to Michael Nalepa, in our office hallway by Michael Nalepa's cubicle. I personally had witnessed Lisa loudly saying "Lick My Dick" to Michael who was an openly gay male employee.

# 193

Date: September 29, 2015

From: Tricia Daniels  
67-29 Bell Blvd, Lower Apartment  
Oakland Gardens, NY 11364  
Email: [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)  
Cell: 310-614-3408

To: EEOC Intake Staff  
New York District Office, EEOC  
33 Whitehall Street, 5<sup>th</sup> floor  
New York, NY 10004

**Re: Question #13-Additional Pages, Charge of Employment Discrimination against Lionsgate Entertainment Corp. and TV Guide Network (now POP TV).**

To: Whom It May Concern:

Enclosed, please find "additional pages" which complete my response to Question #13 on my previously submitted EEOC Intake Questionnaire, which your district office received from me on Tuesday, September 22, 2015.

Thank you in advance for adding these "Question #13-additional pages" to my intake file. The information provided within this "Question #13-additional pages" document will help the EEOC to launch its immediate investigation into the matters alleged.

I can be reached with questions at 310-614-3408 or [triciadaniels2@gmail.com](mailto:triciadaniels2@gmail.com)

Sincerely,

Tricia Daniels

Enclosures

# 194

**#13- WITNESSES, ADDITIONAL PAGES:** Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say.

Before I introduce you to additional witnesses, I want to take this space to say more about 'Witness A' named Michael Nalepa, who I have already written about in my intake questionnaire.

A. Full Name	Job Title	Address & Phone Number
Michael Nalepa	Former Talent Department Assistant, TV Guide Network, Lionsgate (October 2006-January 2011)	Cell Phone: <u>323-387-0849</u> Email: <u>writtenbyanonymous@live.com</u> Website: <u>iamanonymous.org</u> Address: 4937 Ledge Avenue, Toluca Lake, CA 91601

**What do you believe this person will tell us?**

Michael Nalepa is my #1 Witness. In addition to keeping me trapped in a situation, Lionsgate has kept Michael entrapped along with me. If I can only call on one witness- It's Michael. He will be able to demonstrate/show/tell what satellite portal employees logged into, how they broadcast their voices to me, etc. Michael can detail how, today, almost 4 ½ years since my employment with Lionsgate ended, why, I keep getting burned by Lionsgate's broadcast operations machinery. Michael can discuss the privacy rights invasion tort crimes put into place by Lisa Germani (Director, Talent Department).

Michael can discuss how and why, on August 16, 2010, I was "surprise raped" and sexually assaulted for over 4 non-stop hours by a foreign object (the object being, TV Guide Network's broadcasting machinery and satellite transponder assets). Michael can discuss the sexual harassments that I have had to endure broadcast to me by co-workers.

Very importantly, Michael as your top informant and as my #1 witness can detail how "live satellite feeds" also monitored Julia Rolle, a former TV Guide Network producer. Allegedly, Julia had a similar satellite monitoring structure assigned to her because Julia was a player in TV Guide Network's "David Geffen Will Game." Julia Rolle died on July 4, 2010. Michael Nalepa has all of the details on "why" and "how" Lionsgate's broadcast operations machinery ("technology") ended Julia's life.

Michael can provide firsthand details about Nancy Coleman's wrongful bias and retaliation against me where Nancy (EVP of Human Resources, Lionsgate) used her arsenal of Human Resources tools and tricks to destroy my employment and destroy my company benefits. Nancy's bag of tricks included wrongful suspension/wrongful leave of absence/wrongful work stoppage, wrongful fitness-for-duty psychological examinations, belittling me, by telling me "the company wants you to take psychotropic drugs." Michael also has details about my ultimate termination from Lionsgate and how that came to be.

Nancy Coleman's frequent Human Resources actions against me humiliated me in the eyes of my co-workers, destroyed my relationships with my co-workers and ultimately caused me great financial losses.

#195



Michael can discuss how he was recruited by Lisa Germani to play in her "David Geffen Will Game," what he was promised by Lisa Germani and more.

In my Jams Arbitration Demand Package (see Exhibit #2) I include copies of two letters (one from January 2014, the other from May, 2013) which I mailed to Richard Prell, Compliance Officer at Lionsgate. Michael is able to discuss everything in these two letters that Richard Prell received from me.

Michael can discuss how he himself hasn't worked at TV Guide Network in over 4 1/2 years and how he is still able to use what he says are TV Guide Network's (now Pop TV's) owned and leased satellite equipment, (including transponder, spot beams, earth stations, etc.), He can discuss what he remains logged into. He can discuss how since October 16, 2012, he has been host and producer of the "Tricia Daniels Satellite Broadcast," yet he hasn't been paid by Lionsgate. Michael can discuss how he also is a victim of workplace torts including privacy rights invasion via broadcast satellite, and other misconduct committed against him by Lisa Germani (Director, Talent Department).

Please note- that when Michael's employment was terminated by Lisa Germani in January 2011, Michael signed his Separation Agreement, and this means that he is under Lionsgate's control as a "released party." But Michael is the #1 central witness for me.

B. Full Name	Job Title	Address & Phone Number
George Cuervos	Case Manager, JAMS Arbitration	Current Address: 620 8 <sup>th</sup> Avenue New York, NY 10018 Telephone #: 212-607-2789

**What do you believe this person will tell us?**

See notes that I have already written in my intake questionnaire. Additionally, Mr. Cuervos shared with me that David Mandell emailed Mr. Cuervos a copy of the current 2105 TV Guide Network/Pop TV Employee Manual instead of emailing a copy of the needed Lionsgate "New Hire" form that contracted me to arbitrate through JAMS Arbitration-and not sue!

Mr. Cuervos said that Mr. Mandell is not going forward with arbitration with me. Mr. Cuervos said that since there isn't a Jams Arbitrator yet assigned to my case that he as case manager is not able to request that a JAMS Arbitrator subpoena my Lionsgate "New Hire" form which contains the Arbitration Clause that I signed and dated with Lionsgate on February 6, 2009. Mr. Cuervos himself is a case manager, not a Jams Neutral, so Mr. Cuervos is not able to subpoena documents from Lionsgate or from David Mandell.

#196

B. Full Name	Job Title	Address & Phone Number
Randy Young	Former Director of Compensation and Benefits, Lionsgate	(unknown)  Here is a current link to Randy Young's LinkedIn Profile:  <a href="https://www.linkedin.com/pub/randy-young/2a/5a5/685">https://www.linkedin.com/pub/randy-young/2a/5a5/685</a>

**What do you believe this person will tell us?**

Randy will be able to confirm that he personally hosted the "new hire" form filling-out meeting on February 6, 2009 at 1:30pm in Lionsgate's TV Guide Network offices. The meeting was held in our largest conference room (called "The Hollywood Room") and there were at least 60 employees of TV Guide Network in attendance with me.

Lionsgate had just purchased TV Guide Network and we all instantly became Lionsgate employees. Therefore we all immediately had to fill out official Lionsgate "new hire" forms, official Lionsgate benefits forms, and other misc. required Human Resources paperwork.

Randy needed to collect copies of our Driver's Licenses, Birth Certificates, Passports, etc.

Randy will be able to confirm that as the Human Resources official who was the host of our meeting that he personally went through each and every clause that was contained on Lionsgate's "New Hire" form with us, making sure that all of us in attendance understood each clause before we signed our signatures to it and dated it.

Randy will be able to confirm that one of these "New Hire" form clauses that he discussed and instructed all of us individually to read, sign and date was the JAMS Arbitration Clause.

The wording of the JAMS Arbitration Clause required all of us in the room to arbitrate any and all issues whatsoever that arose both during and after our Lionsgate employments through JAMS Arbitration. The clause further explained that "all" meant everything from sexual harassment, discrimination, wrongful termination, etc.

When we emerged from this meeting with Randy, we were all new employees of Lionsgate. (See Exhibit #15).

# 197

C. Full Name	Job Title	Address & Phone Number
Anne Alderete	Former Managing Editor, TV Guide Network, Lionsgate	<p>Anne currently works for: Wagstaff Worldwide.</p> <p>Her current title at Wagstaff is: Account Supervisor</p> <p>Email: <a href="mailto:anne@wagstaffworldwide.com">anne@wagstaffworldwide.com</a></p> <p>Office Telephone #: <a href="tel:323-871-1171">323-871-1171</a></p> <p>Office Address: 6725 Sunset Blvd, Suite 590 Los Angeles, CA 90028</p> <p>Personal Blog: <a href="http://www.tunatoast.com">www.tunatoast.com</a></p>

**What do you believe this person will tell us?**

Anne is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see Anne's clauses which should be uniform to mine.

If Anne talks to the EEOC Investigators, Anne has a lot of explaining to do. As one of the group of TV Guide Network's tortfeasors, Anne was a harasser and during her terror broadcast of 12/24/10, Anne was a sexual harasser due to her lewd comments made. Anne can detail how and why she personally used TV Guide Network's FCC License and broadcast technology equipment as her own to broadcast to Tricia Daniels in November 2010 and in December 2010. Anne needs to explain to all of us, why on December 24, 2010 she hosted and produced a broadcast which terrorized me. Anne caused religion harassment and made me fear for my life and for the life of someone else. Anne that night for a couple of hours kept broadcasting quote- "We Just Killed David Geffen and we're here to KILL YOU! No more dirty stinking fucking Jews at TV Guide Network."

I feared for my life, I didn't know if Anne was going to "surprise rape" me for 4 hours or worse. I feared for the life and immediate safety of David Geffen. I feared for the lives and immediate safety of my family in New York, I feared that members of my family (in New York) would not get "surprise raped" The terror, fear and emotional distress that Anne delivered that night remains unfathomable!

#198

<b>D. Full Name</b>	<b>Job Title</b>	<b>Address &amp; Phone Number</b>
Lynda P. Noiseux	Former neighbor to Tricia Daniels at Doheny Drive Apartments	Current Address: 723 Westmount Drive, Unit 101 West Hollywood, CA 90069 Telephone #: not known

**What do you believe this person will tell us?**

Lynda Noiseux has quite a story to tell about all of her interactions with my TV Guide Network co-workers. What did TV Guide Network promise Lynda? Why would Lynda (my next-door neighbor) have satellite access where her voice was broadcast to me as harassment from late August 2010 through mid-November 2010? Lynda broadcast incredible things and at all hours. Why was Lynda repeatedly talking about having a friend of hers named Mark break-in through my window to rape me in my sleep? Why did Lynda say that Lisa Germani of TV Guide Network hired her? (Note- it may have actually been Michael Nalepa!) Why would Lynda help TV Guide Network co-workers terrorize me? Did Lynda help set-up robberies of my apartment? Why did Lynda on Friday night, August 13th, 2010 work with TV Guide Network co-workers to set-up the sexual harassment and "terror" installed on me that night? Lynda has so much to explain including if TV Guide Network gave her access to their privacy rights invasion facts about me. Why would Lynda my next-door neighbor commit tort crimes against me? Why would Lynda be broadcasting along with my co-workers on TV Guide Network's "Tricia Daniels 24/7 "live feeds" satellite broadcast?

<b>E. Full Name</b>	<b>Job Title</b>	<b>Address &amp; Phone Number</b>
David Anderson	(current employee of Pop TV, Lionsgate)  Current: Title: Promo Scheduling Coordinator	email: <a href="mailto:david.anderson@poptv.com">david.anderson@poptv.com</a>  cell phone number from 2011 (may still be good): <a href="tel:213-700-7112">213-700-7112</a>  office number: <a href="tel:323-856-4000">323-856-4000</a> (dial by name and enter David Anderson)  Office address: 5510 Lincoln Blvd. Suite 400 Playa Vista, CA 90094

**What do you believe this person will tell us?**

David Anderson is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see David's clauses which should be uniform to mine. Since his original separation date, David returned to TV Guide Network for new employment there.



In 2010, David Anderson also used TV Guide Network's FCC licensed broadcast machinery to transmit, host and produce audio that was beamed to me. How does David explain his use of company assets? To his credit, David never harassed, when David was at the microphone he was a good host and producer and we had intelligent conversation. It was a lovely break from all of the sexual harassment, tasing and lewd comments that took place when other co-workers had control of the microphone.

David can detail which TV Guide Network satellites he was logged into, which of TV Guide Network's FCC licensed broadcast frequencies he was broadcasting to me on. David can detail what microphone equipment he was using to broadcast his audio to me. Even when I was driving my car one night, in the middle of the desert on the way to Palm Springs, CA, David was able to broadcast to me. David can explain why he feels this broadcast exists, the history of it, what personal gain David Anderson was promised from his participation in Lisa Germani's "David Geffen Will Game," who from Senior Management knew about this 24/7/365 "Tricia Daniels Live Feeds Broadcast" and more.

David Anderson's former boss Scott Woodward (Executive Vice President of Programming and Production) was also my boss from 2005 through 2010. Lisa Germani became my boss in January 2011 when Nancy Coleman, (EVP of Lionsgate's Human Resources Department) reassigned me to Lisa. As mentioned within my Jams Arbitration Demand (Exhibit #2), Lisa Germani should never have been allowed to manage staff or run a department because Lisa didn't have the California State Law required sexual harassment supervisor training.

Did my former boss (David's boss) Scott Woodward know about the tort crimes taking place? Did Scott and fellow Vice Presidents Jack Carey and Paul Adler condone employee criminal behavior?

F. Full Name	Job Title	Address & Phone Number
Amy Sweet	Former Writer, TV Guide Network, Lionsgate	cell number from her Facebook Page: <u>310-217-7638</u>  a possible home number from her Facebook Page: <u>818-663-5412</u>  Cell Phone (From 2011) 818-970-2460

**What do you believe this person will tell us?**

Amy is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see Amy's clauses which should be uniform to mine.

Amy in 2010 (like David Anderson) was an employee who regularly broadcasted to me using TV Guide Network's FCC license as her own. Why did Amy participate in these "Tricia Daniels broadcasts"? What

Senior Management person at TV Guide Network authorized her or assigned her to this project? Like David Anderson, and all of my other co-worker broadcasters, what equipment was Amy using? How much information did Amy know about how my eyesight was being damaged by the technology? Why would Amy and every other employee not call Nancy Coleman (EVP of Human Resources) and report that there was a problem here at TV Guide Network which stemmed from Lisa Germani's long-condoned misuse of broadcast satellites that was out of control? Isn't it their duty (according to Lionsgate's Employee Manual) to report Lisa's criminal activities? The Lionsgate Employee Manual spells out all of the procedures that employees are supposed to follow in uncertain and difficult situations.

How could Amy, allow TV Guide Network to keep this technology on me? "Surprise Rape" could have returned at any moment. During September, October and November 2010, I was being assaulted by taserings that burnt my female body parts. These taserings were targeted energy omitted from the satellite transponder. My #1 witness Michael Nalepa (see: A) knows the most information about the technical architecture of the broadcast machinery and the science behind how I was (and am) able to get burned by it.

Why would Amy Sweet not be able to get Senior Management in 2010 such as Jack Carey, Scott Woodward, Paul Adler, and Kristan Giordano to stop the harassment broadcast and to stop "The David Geffen Will Game"? This would have stopped the taserings and would have stopped the terror and emotional distress roller coaster ride that co-workers kept me on 24/7.

Why would Amy not be able to report or stop my terror-filled "satellite kidnapping"--when I was kidnapped for 6 weeks via audio broadcast voices that I did not recognize. From early morning August 24 or 25, 2010 until late afternoon on October 12, 2010, I was put in fear for my life, for my family's lives, and for David Geffen's safety and security.

---

G. Full Name	Job Title	Address & Phone Number
Laura Slobin	Former Writer/Producer, TV Guide Network, Lionsgate	Personal Email address: <a href="mailto:thinkoflaura@gmail.com">thinkoflaura@gmail.com</a>  Cell Phone (From 2011): 818-802-7529

**What do you believe this person will tell us?**

Laura is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see Laura's clauses which should be uniform to mine.

Laura Slobin was one of my co-workers who broadcast to me in October 2010. Laura returned to the microphone in 2011. From January 2011 to April 2011, Laura was a member of the "Core Group Family/Rick Saloomey" team of broadcasters who used the "always on" "live feeds," Tricia Daniels satellite as their own.

Like Amy Sweet, I feel that Laura Slobin should have called Nancy Coleman (EVP of Lionsgate's Human Resources Department) to report that Tricia Daniels was telling Nancy Coleman the truth since Nancy entered the picture on October 15, 2010 and that Nancy Coleman wrongly threw Tricia Daniels out of the office and continued to wrongly punish Tricia Daniels when Lisa Germani was the one who Nancy needed to talk to.

For some reason, Laura Slobin, Amy Sweet, Rick Saloomey and my other co-workers were afraid to call Nancy Coleman of Human Resources. Maybe after they saw the way that Nancy Coleman unfairly treated me and kept punishing me when I kept reporting "live satellite feeds" and misconduct to her, my co-workers were scared to contact Nancy as my co-workers wanted to fiercely protect their own employments and company benefits.

I feel that his same group of co-workers should have confronted Lisa Germani and demanded that Lisa end her "Live Feeds, end her "David Geffen Will Game" end her privacy rights invasion, and outrageous harassment campaign and surveillance of Tricia Daniels. Perhaps this group of employees were scared of Lisa Germani for the same reasons that they were scared of Nancy Coleman.

Lisa Germani had a known history of messing up innocent employees employments at TV Guide Network, perhaps they were scared to incur Lisa's wrath.

H. Full Name	Job Title	Address & Phone Number
Rick Saloomey	Former Supervising Producer, Specials Department, TV Guide Network, Lionsgate	Current Home Address: 47 Colony Circle Westfield, MA 01085

**What do you believe this person will tell us?**

Rick is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see Rick's clauses which should be uniform to mine.

Why would Rick Saloomey participate in these broadcasts? Why would Rick Saloomey not call Nancy Coleman (EVP of Human Resources, Lionsgate) to tell her that we had a big mess at TV Guide Network that needed cleaning up? Rick's job title was Supervising Producer, he was a member of TV Guide Network's management structure. Rick could have also stood up and confronted Lisa Germani about her "live feeds" satellite broadcast but he didn't. Instead he just kept it going. It would have been so easy for Rick to take a leadership position by calling Nancy Coleman to say 'Nancy, you need to meet jointly with me, with some members of my team and with Tricia Daniels about what's been taking place with employees misusing satellites and broadcast operations machinery to play Lisa Germani's "David Geffen

Will Game.” Rick could have said to Nancy that ‘Tricia Daniels has been telling Nancy the truth since October 15, 2010, the day that Nancy started her discrimination of me.

Instead of righting wrongs, Rick Saloomey just kept the “live feeds” going on.

I. Full Name	Job Title	Address & Phone Number
Greg Hughes	Former Director of Operations, TV Guide Network, Lionsgate	<p>Greg currently works at Revolt TV where his current title is: Studio Technical Manager</p> <p>Work address: 1800 N. Highland Avenue Hollywood, CA 90028</p> <p>Office Telephone Number is: (323) 645-3000 (ask to speak to Greg Hughes).</p> <p>Cell Phone (From 2011): 323-855-2740</p>

**What do you believe this person will tell us?**

Greg is signed to Lionsgate via an employee separation/confidentiality agreement. Please see the employee separation/confidentiality agreement that I was issued (Exhibit # 14) to see Greg’s clauses which should be uniform to mine.

Next to witness Michael Nalepa, Greg Hughes is the most knowledgeable about the technical architecture of how TV broadcast satellites are able to electronically monitor me, broadcast to me and taser, burn and assault me- everywhere I go.

I feel that Greg is one of the architects who helped Lisa Germani set up the satellite monitoring/live feeds to Tricia Daniels. Greg is a broadcasting operations genius. Greg has worked with satellite transponders, earth stations, broadcasting transmitters, antennas, uplinks, downlinks, transmission path charting, FCC licensed frequencies, closed captioning machines and more for many years.

# 203



J. Full Name	Job Title	Address & Phone Number
Fernita Wynn	Former Senior Talent Booker, TV Guide Network	Current Address: 19000 Sherman Way, Unit #6 Reseda, CA 91335  Cell Phone (From 2010): 818-793-8939  LinkedIn: <a href="https://www.linkedin.com/pub/fernita-wynn/35/b09/273">https://www.linkedin.com/pub/fernita-wynn/35/b09/273</a>

**What do you believe this person will tell us?**

I believe that Fernita Wynn is not signed to a Lionsgate Employee Separation/Confidentiality Agreement because Fernita resigned from our company in July 2010 to take a job in Atlanta, Georgia at "The Mo'Nique Show" on BET. If Fernita has a different type of "employee exit agreement" with Lionsgate, I am not privy to it.

Fernita Wynn would be able to answer questions about what she knows about the beginnings and the set-up of "The David Geffen Will Game" at TV Guide Network. Fernita will be able to share details about employee misuse of satellites that occurred while she was an employee. (Fernita worked at our company from August 2005 to July 20 or July 21, 2010.)

Fernita would be able to detail the night of satellite terror that co-workers put me through on October 26, 2006. Fernita would be able to confirm to you that like me, Julia Rolle was a victim of company misuse of satellites and broadcasting operations machinery.

#204

K. Full Name	Job Title	Address & Phone Number
David Park	<p>Former Freelance Producer, TV Guide Network, Lionsgate</p> <p>*Note: David was not a full time employee therefore David may not have ever been given a Lionsgate "New Hire" form to fill out which contained Lionsgate's standard JAMS Arbitration agreement.</p> <p>Because he was not an employee, David invoiced TV Guide Network for his services.</p>	<p>Cell phone number (from 2011): (323)708-0372</p> <p>Home Address (from 2011): 1755 El Cerrito Place Los Angeles, CA 90028</p> <p>Twitter: <a href="https://twitter.com/davidpavid">https://twitter.com/davidpavid</a></p> <p>Facebook: <a href="https://www.facebook.com/david.park.3154284?fref=ts">https://www.facebook.com/david.park.3154284?fref=ts</a></p>

**What do you believe this person will tell us?**

I believe that David Park is not signed to a Lionsgate Employee Separation/Confidentiality Agreement because he was a freelancer, nor would he be signed to the Lionsgate "New Hire" forms that I was signed to on February 6, 2009.

David Park can detail his participations in "the Live Feeds" that were being broadcast to me 24/7, 365 days a year. These "Live Feeds" were staffed by my co-workers and David Park had many broadcasting shifts. David can detail who was in-charge of scheduling his broadcasting sessions, what equipment he was using to broadcast to me and what personal gain he was promised.

David Park was broadcasting on December 24, 2010. It was Christmas Eve and David is a witness to what took place that night. Anne Alderete joined the broadcast to commit her "We Just Killed David Geffen and we're here to kill you. No more Dirty Stinking Fucking Jews at TV Guide Network" broadcast.

#205

August 3, 2015- Claim Notes Document

---

Prepared by

Tricia Daniels, August 3, 2015

**Claim Notes for: David Mandell, the JAMS Arbitrators and for my Lionsgate family:**

I, Tricia Daniels, hereby declare, under the penalty of perjury, that the foregoing is true and correct, to the best of knowledge, information, and belief:

Note #1: From fall 2010 through early February 2014, I followed the instructions in Lionsgate's Employee Manual and made more than 22 reports to the following: a) Lionsgate's Human Resources Department b) to Senior Management of TV Guide Network, and c) to Lionsgate's Compliance Officer (named Richard Prell) about the wrongful activity that I was an on-going victim of.

Note #2: When I received David Mandell's "Cease & Desist" email dated February 5, 2014, I obeyed it and I stopped contacting Lionsgate's Human Resources Department and I stopped contacting TV Guide Network Senior Management about the satellite assault that I remained a daily victim of.

Note #3: David Mandell's "Cease & Desist" email scared me so much that I was afraid to even reply back to David Mandell. I am not a criminal, I am the victim of a continuing workplace crime that had been committed against me since August 2010 (even earlier) by a group of TV Guide Network co-workers.

Note #4: On February 5, 2014, I had not been an employee of TV Guide Network for about 33 months. Both upon and after receiving David Mandell's "Cease & Desist" email, I remained stuck as a victim of a 'technology imprisonment crime' where I was still (and still am) being badly assaulted (burned, bashed, tasered, satellite slapped) multi-times on daily basis by what former co-workers throughout 2010 to today have stated is TV Guide Network's owned and leased broadcasting machinery that TV Guide Network (now Pop TV) pays for. (I.e.-earth station, broadcast satellite transponder, closed captioning machine, and an unrevealed technical architecture).

Note: #5: In 2015, I continue daily to try to learn about this broadcasting technical architecture from former TV Guide Network co-worker Michael Nalepa, as Michael Nalepa and I remained "glued" together by some sort of "Live" two-way audio communication. Even as I write this document.

#206

Note #6: Another way that I can describe the “Live” two-way “always on” audio communication is like this:

Imagine this scenario: Madonna joins Barbara Walters “live” in New York City on ABC-TV for a prime time TV interview. They have a great on-camera chat and when the interview is over Madonna leaves the studio to go home. Madonna is no longer wearing an interview microphone, there are no T.V. cameras around, Madonna is in her limo on her way home and strangely she is still hearing Barbara Walters’ voice. Also strangely from the privacy of her limo, Madonna starts talking to Barbara Walters in real time!

It’s surprising to Madonna that she and Barbara Walters have somehow been “glued” together in a “live audio feed” type of broadcast. It’s surprising to Barbara Walters as well that either by the magic or misuse of broadcasting technology that they remain “glued” together in conversation. As each hour goes by Madonna and Barbara remain connected in “live” two-way real time conversation by satellite technology.

Even a few days later, when Madonna boards a private jet to fly to Los Angeles she and Barbara Walters remain connected in conversation. And all throughout Madonna’s flight, she and Barbara are chit-chatting without interruption.

Their situation begins to detail what I’ve been through. But thank goodness in the scenario outlined here, neither Madonna nor Barbara Walters has been a victim of the other part of this equation. The other part being the burning & bashing assaults, the eyesight lighting issues and the pain and suffering that I have had to endure due to TV Guide Network’s broadcasting technology. Also- Madonna knows that she is talking to Barbara Walters. But when my event started on August 24 or 25, 2010, when the first words were uttered, I was connected to a gang of voices, voices that were all unknown to me. My ‘satellite kidnappers’ knew everything about me, yet I was terrorized- who were these people and why would they be ‘satellite-kidnapping me?’

Note #7: In mid-December 2012 and again a few months later, I telephoned Jack Carey, Senior Vice President of Operations for TV Guide Network. Per my personal experience when I was an employee, I knew that Jack was in charge of TV Guide Network’s broadcasting facilities, broadcast operations employees, broadcasting machinery assets, and also in charge of TV Guide Network’s Tulsa, Oklahoma based Network Operations Broadcasting Facility. Jack had also been TV Guide Network’s FCC contact.

Note #8: During our phone calls, Jack was very cordial, very professional and in my 2<sup>nd</sup> phone call with Jack (circa March 2013), Jack stated “it’s not us, it’s not us.”

Note: #9: Today, in August 2015, I realize that Jack Carey was not ‘under oath’ at the time that I spoke to him. And also in August 2015, due to remarks recently made by

# 207



Michael Nalepa (who remains glued to me by the on-going satellite broadcast), Jack may not even know that we are connected. That it may be current employee Paul Adler's team that is responsible for this and that Paul may not even know that Michael Nalepa and I are still connected. Michael Nalepa seems to have these answers.

Note #10: Let's now go back to February 5, 2014, I was in my West Hollywood, CA apartment and I had just received David Mandell's "Cease & Desist" email and I was scared to even reply back to him. I was not a criminal, I was (and still am) the victim.

Note: #11: As February 2014 turned into March 2014...and then into April 2014, I continued to be badly and painfully assaulted by TV Guide Network's 24/7 daily satellite broadcast. The high-wattage burnings, genital taserings, bashings, slaps and more continued.

Note #12: In April 2014, I was still scared to contact David Mandell because of his "Cease & Desist" email to me. I did not want to trigger David Mandell possibly putting an injunction on me nor did I want to risk possibly triggering David Mandell's filing of a police report about me. I was the victim, not a criminal at all.

Note #13: On February 5, 2014, the day when I originally received David Mandell's "Cease & Desist" email, I was afraid to even go to the supermarket for fear that I'd run into any former TV Guide Network employee who would have been placed there by one of my tortfeasors purposely to greet me, or who would possibly egg me on into conversation about wrong-doing that had taken place at TV Guide Network, which would make it look like I had violated David Mandell's orders. Furthermore, I was afraid of actually being in the same city, in the same state as Michael Nalepa. My body just could not take any more of the technology assaults nor could my body take any more burnings.

Note #13A: There was also the possibility that Michael Nalepa still had a key or entry access to my apartment through his alleged 2006, 2008, 2009, 2010, 2012, 2013, and 2014 interactions with the management of my apartment building and with select neighbors who lived in my building. (Michael Nalepa has these answers).

Note #14: After receiving David Mandell's "Cease & Desist" email, I once again considered going down to the Santa Monica Courthouse to file for a State of California, City of Los Angeles restraining order against Michael Nalepa.

Note #15: But for the same exact reasons that I didn't file for a restraining order against Michael Nalepa on my two visits to the Santa Monica Courthouse during calendar year 2013, I just could not bring myself to file a 2014 restraining order against Michael Nalepa for these reasons:

# 208

a) I feel that Michael Nalepa is a victim of what my former co-workers Lisa Germani and Fernita Wynn revved him up and ratified him to do.

b) In California, requesting a restraining order is a very public process involving a hearing before a judge, and the database of public filings seems not to be sealed-off to the media. I wanted to protect Lionsgate, CBS Corp., David Geffen, Allen Grubman, Allen Shapiro, TV Guide Network employees, Rupert Murdoch, News Corp., Dick Cashin's One Equity Partners and Rovi from any non-sought news media publicity/public awareness that could arise from my need to take out a restraining order on Michael Nalepa.

c) In February 2014, I had recently seen an interview-article about Michael Nalepa that was published on the internet during calendar year 2013, which stated that in 2006, Michael Nalepa was diagnosed with Bipolar Disorder. I did some internet research about Bipolar Disorder and found that it was formerly called "manic depression." I found that Bipolar Disorder was described as a disorder associated with mood swings ranging from depressive lows to manic highs. In February 2014, as I remained a victim of "Michael Nalepa's Satellite Broadcast," I could only imagine the possible suffering and possible state of mind, emotional distress, unpredictability's and more that Michael Nalepa suffered through and coped with from moment to moment due to his suffering with Bipolar Disorder. It seemed that I was experiencing it "LIVE" firsthand as Michael Nalepa and I remained "glued" together through TV Guide Network's state-of-the-art satellite broadcasting technology. I am a person who doesn't hurt anyone, even if that person has hurt me. I just could not bring myself to hurt Michael Nalepa.

d) I felt that filing a restraining order, or a police report would have also hurt Michael Nalepa's family. In either late 2009 or early 2010, I met Michael Nalepa's parents when they visited their son at TV Guide Network's Hollywood offices. It was Michael Nalepa who personally introduced his parents to me. I was honored to meet them. I found Michael Nalepa's parents, Tony & Marie Nalepa to be extraordinary folks. They were in Los Angeles, CA visiting from their home city of Wheeling, Illinois and their excitement, parental proudness, and love for their son was very apparent. Clearly, to me, Tony & Marie Nalepa were incredible parents. If I would have filed for a restraining order against their son, I felt that it would greatly hurt the Nalepa family. And I also felt that the filing of a restraining order against Michael Nalepa could also cause non-sought publicity/public awareness and media attention of FCC licensee and Intelsat customer wrong-doing at TV

# 209

Guide Network. (Intelsat, is a very well-known Satellite Vendor, one of the actual leaders worldwide, of all satellite vendors.)

e) In my Letter #1 to Richard Prell (Compliance Officer, Lionsgate, and dated May 7, 2013) I suggested that Lionsgate should hire Michael Nalepa as a special technical consultant and informant. In May 2013, I still really needed to be rescued from the satellite assaults and batterys, and the wisdom in me, thought that this would be a great way to go. It was an opportunity for me to be rescued and for Michael Nalepa to feel of worth to Lionsgate.

f) Upon his receipt of my letter, I got no reply from Richard Prell, so I telephoned him. He picked up his ringing phone and answered "Rich Prell" and when I said who I was, he quickly said that he had to run off to a meeting and that he'd call me back. When Richard Prell did not contact me back nor have anyone from Human Resources or TV Guide Network call me, I called and left a new voicemail message. Again, no reply from Richard or from Human Resources, so I called Richard and left a third voicemail message one final time for him. This third voicemail message like my first two messages was met with NO REPLY AT ALL.

Note #16: Let's go to April 2014, I was unemployed, had no unemployment insurance, no form of income. In abeyance to David Mandell's "Cease & Desist" orders, I was afraid to send resumes out to former TV Guide Network co-workers, I was afraid to contact former TV Guide Network bosses such as Scott Woodward and Matt Singerman to ask if they'd consent to be employment references for me. I was afraid to return a former co-worker's social telephone call (named Sabrina Taylor) and I was afraid to email back to another former co-worker (named Victoria Kordysh) who reached out to me for my help as she was networking with me because she was in search of a new Production Coordinator job and she wanted to see if I knew of any potential openings for her. I was in a strange situation where I remained "glued" to Michael Nalepa yet I needed not to have contact with my former TV Guide Network family members as I would have been in violation of David Mandell's "Cease & Desist" order.

Note #17: Also, in April 2014, I daily remained a victim of the on-going assaults and batterys that were originating from TV Guide Network's satellite and earth station machinery.

a) I had a disfigurement on my front scalp that I tried to keep covered up. I can best describe it as a golf-ball sized burn-bump on my head complete with a hole in it that blood and puss started oozing out from due to the energy-directed technology assaults that repeatedly hit this area of my scalp from TV Guide Network's machinery. (In early February 2014, I took some photographs with my

#210



IPad of this burn-bump and I immediately emailed these to Jack Carey, Senior Vice President of Operations for TV Guide Network and to Eileen Kohler, Human Resources, Lionsgate). I emailed these because I desperately needed TV Guide Network's satellite broadcast disconnected from my body. My scalp just could not take another blast.

- b) My eyes were still being affected by TV Guide Network's satellite technology and it remained difficult to have normal freedoms of life.
- c) I was a victim of two police reports that allegedly Michael Nalepa had made to the Los Angeles Police Department about me. (see Note #39, below)
- d) I needed to somehow escape from Michael Nalepa's technology assaults and at the same time I needed to protect myself so that I would not violate David Mandell's "Cease & Desist" order. Also- I just needed to protect me, my body, and my total self from any further harm and future chance of harm.
- e) I decided that I would move 3000 miles away, to New York City. I'd try to lift myself out of being a victim of TV Guide Network's technology and perhaps Michael Nalepa and my former TV Guide Network co-workers would lose interest in me and end the satellite assault broadcast once I moved cross-country.

Note #18: So, on April 25, 2014, at 53 ½ years of age, I fled from my West Hollywood, California rent-controlled apartment, where I had paid monthly rent and lived for a little more than half of my life. I left my friends and Hollywood industry business associates, to quickly relocate to Queens, New York.

Note #19: Surprisingly, throughout my entire time as a new resident of New York, (from April 26, 2014 to the present moment, even as I write this document), Michael Nalepa and I have remained connected via the same satellite broadcast that has been on-going since August 24 or August 25, 2010 that allegedly is broadcast to me by TV Guide Network's broadcasting machinery (earth stations, satellite transponder, Andrew antenna, transmission path to the earth station, etc.)

Note #20: Throughout each day and night, Michael Nalepa and I have intelligent conversations, we sometimes laugh at a funny joke or occurrence that happens, we discuss current events together, and we discuss that we're both victims of "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" as well as victims of "Rick Saloomey's Core Group Family" team of broadcasters and victims of "Nancy Coleman's Big Mess." Lately, other former co-workers such as Richard Prell, Eileen Kohler, Brett

#211



Pugliese, Paul Adler, Kristan Giordano, Fernita Wynn, Amy Sweet, Scott Woodward, and Greg Hughes dominate certain conversations.

Note #20A: And there's a whole group of people who don't even know that we talk about them regularly via TV Guide Network's "always on" broadcast satellite.

Note #21: While a New York City resident, I've continued to get different degrees of satellite assaults. It seems that on certain days Michael Nalepa takes good care of me trying not to hurt me too much, however, there have been many other days when Michael Nalepa just seems to 'lose it' and I get painfully hurt with new pain and sufferings due to directed energy technology assaults, their wattages, their points of impact on my body. Some days, I get repeated painful assaults on the same spots of my body.

Note #22: Upon moving to New York, I continued to get new blasts of burning energy from TV Guide Network's broadcasting machinery to the bum-bump area on my scalp. This caused more blood and puss to stream out of the hole that had been created in it by the blasts. Today, on August 3, 2015, I still have the bump on my scalp but it's no longer golf-ball sized. My hair covers it and I no longer consider myself disfigured from it.

Note #23: Of course, I have compassion for Michael Nalepa due to his on-going Bipolar Disorder condition. I also realize that Michael Nalepa remains a victim of the alleged wrongdoings to him that took place and remains a victim because whatever his former boss, Lisa Germani, along with Fernita Wynn promised him did not work out for him. (Michael has his own story to tell which I am not privy to).

Note #24: Daily throughout Michael's 2015 broadcasts he has continued to say that he never would have gotten involved in all of this had he known that things for him would turn out this way. I have heard Michael say this many times in his broadcasts since July 14, 2013.

Note #25: Lately (during 2015), it seems to me through our "live" conversations that Michael Nalepa is also a victim of being given wrong pieces of information that were purposely told in twisted form to him from Lisa Germani, Fernita Wynn and possibly others.

Note #26: Clearly, Michael Nalepa has his own story to tell about all of this and how he became TV Guide Network's Satellite Molester. In the past, I've stated in reports that I made to Lionsgate that Michael Nalepa has been working as host and producer of the employee self-interest satellite broadcast since October 16, 2012. But lately, Michael has stated that he has been a participant in these broadcasts as far back as 2011....and in 2010.

# 212

Note #26A: I do know from Michael's own admissions that while he was an employee, Lisa Germani gave Michael continued access to satellite technology, definitely in 2010 and as far back as October 26, 2006 when that night for about 10 consecutive hours I got terrorized and put into immediate fear for my life as I was home in my apartment.

Note #26B: During Calendar Year 2011, The "Rick Saloomey Broadcasting Team" revealed to me (via the "always on" satellite broadcast) that they have a transcript of what I went through that October 26, 2006 night and that the tools of terror were "Lisa Germani's Satellite Media Tour." Rick's team also made mention that the sounds that were broadcast to me that night of October 26 remain on the machinery.

Note #27: Regarding the Burnings that I've been victim to since I've moved to New York—well, it's been more of the same burnings and assaults (bashing, taserings, satellite slaps) that I was victim to when I lived in Los Angeles. I was hoping these assaults would not follow me to New York.

Note #28: The worst of my assaults while a resident of NYC took place on October 14, 2014 sometime after 3:00am Eastern Time. I got brutally barbecued in my bed with bone-crushing, burning force aimed at the left side of my stomach allegedly from TV Guide Network's broadcasting machinery (earth stations, satellite transponder, etc.) At the time of this writing I still have not fully healed from this particular assault. That night, once again in the safety of my bed, I was helpless. There was no 1-800 number to call. No one at TV Guide Network to call due to David Mandell's "Cease & Desist" email that I received seven months earlier. I could not even telephone Jack Carey because I would have been in default of the "Cease & Desist."

Note #29: Another bad night was November 14, 2014 when once during that night a mini-repeat of the October 14, 2014 event took place to the same exact area of my body. I was still too scared to contact David Mandell.

Note #30: Since November 14, 2014 there have been many (way too many) satellite assault hits to this area of my stomach mentioned in Notes #28 and #29.

Note #31: On Friday, July 24, 2015, there were 3 new direct energy hits to this area of my stomach which just added more pain. On Friday, July 24, 2015, I could again tell from the "always on" audio broadcast that Michael Nalepa was having a 'summer bummer' of a day, which in my opinion was probably due to his Bipolar Disorder and his approaching birthday that was two days later. Instead of being out celebrating his 34<sup>th</sup> birthday, the forecast for the weekend was that Michael Nalepa would be spending his Sunday birthday still connected to me, thanks to the magic or misuse of TV Guide Network's broadcasting machinery.

#213

Note #32: On July 21<sup>st</sup>, 2015, I again said to myself, "enough, my body just can't take another blast".... and I decided that I had to file a JAMS Arbitration request. I just couldn't bear any further assault, pain and suffering to my body.

Note: #33: Suddenly on July 21<sup>st</sup>, 2015, it was better for me to risk triggering a possible injunction or police report made by David Mandell then not filing with JAMS.

Note #34: All of these almost-18 months since receiving David Mandell's "Cease & Desist" email, I have been afraid to personally reach out to David Mandell and have been afraid to even answer his "Cease & Desist" email by sending acknowledgment and assurance back to him which he asked for. I am a TV Show Talent Booker, I don't have a lawyer. I don't have legal training. After that October 14<sup>th</sup>, 2014 violent assault to my stomach area, I did a little bit of 'attorney shopping'.

Note #35: Here's a big 'something new'....Last month I learned that David Mandell is the son-in-law of powerful entertainment attorney Charles B. Ortner (Proskauer Rose, LLP). David Mandell is married to Chuck's daughter Amy and the two grandchildren that certainly must bring Chuck so much joy belong to David Mandell and his wife Amy. Certainly, I feel that through my many years of involvement in the music business that Charles B. Ortner, his late wife Jane and I must have been in the same room at times during certain music industry dinners and events (I.e. - T.J. Martell Dinners, at Clive Davis parties, at NARAS events, possibly BMI and ASCAP events, possibly at high-end label parties). To me, this makes David Mandell and myself 'music industry extended family' not to mention 'TV Guide Network family.' And yes, I clearly remember seeing David Mandell's name on company lists during our joint News Corp. managed 'Gemstar-TV Guide' era (circa 2004-2007).

Note #36: Today, it's August 3, 2015 and Michael Nalepa's birthday was 8 days ago, on July 26. It was the third birthday that I spent "Live" via satellite with Michael Nalepa as he continues to host and executive produce TV Guide Network's "always on" satellite broadcast.' Since August 24 or 25, 2010, this broadcast has stayed "on" non-stop and Michael Nalepa continues to have all of the answers regarding: the technical architecture of how it's connected, who in 2010, 2011, 2012 staffed this thing with TV Guide Network employees, former employees, a couple of freelancers, and "John Does" who were broadcasters to me.

Note 36A: Michael Nalepa also keeps close to the vest answers as to how the technical architecture may have slightly changed from August 2010 through today. Michael Nalepa can tell us why this satellite broadcast still exists, which current TV Guide Network/now POP TV employees know that this broadcast still exists and why these current employees keep it going on.

#214



Note #37: From August 2010 through today, this satellite broadcast has been staffed by different sets of my former co-workers. Through these almost five years, some of the names of this satellite broadcast have been:

- “The Live Feeds” (fall 2010 and early 2011)
- “Lisa Germani’s Privacy Rights Invasion Satellite Media Tour” (2010 to the Present)
- “Nancy Coleman’s Big Mess” (2011 to 2012, and again in July and August 2015)
- “The Core Group Family/Rick Saloomey Team Satellite Media Tour” (January 2011 through October 15, 2012)
- “Michael Nalepa’s Satellite Broadcast” (October 16, 2012 to the present)

Note #38: It’s August 3, 2015 and Michael Nalepa and I remain connected around-the-clock, daily and nightly, even while we sleep. Yet he resides in Los Angeles, California and I reside 3,000 miles away in New York. Wherever I am we are connected. If I am at home we’re connected, if I am on an airplane (as I was on April 25, 2014 flying from Los Angeles to New York City—one way!) we’re connected. If I am on a New York City Public Bus going through the Midtown Tunnel even while that bus is traveling underground and underneath New York City’s East River, Michael Nalepa and I remain connected without any loss of broadcast signal, without weather interference, in “live” two-way conversation with each other. All through the magic (or misuse?) of TV Guide Network’s broadcasting technology.

Note #39: Here is more information regarding the two alleged phony Police reports made about me to the Los Angeles Police Department by Michael Nalepa.

The first report was made to the Beverly Hills Police Department on August 20, 2010. Suddenly three Police Vehicles showed up with flashing lights, there were 6 policeman who showed up looking for me. Without an attorney of my own, the Beverly Hills Police Department refused to allow me to have any information on the exact report made and without an attorney, I am not able to purchase a copy of this police report. (Detective Coulter of The Beverly Hills Police Department can be contacted by David Mandell or by the JAMS Arbitrators to tell us what the complaint made about me was.) Michael Nalepa still won’t reveal the exact complaint but he’s offered a few hints every now and then.

The second Police Report made by Michael Nalepa about me, took place on Friday, January 17, 2014. Early that morning, I received a telephone message as well as an email from Detective Christopher Allen of the North Hollywood, California police station. I was in disbelief, I had done nothing wrong, and it was I who was the victim of the on-going continuing crime spree kept in place by TV

# 215



Guide Network's broadcasting machinery. Immediately, I forwarded Detective Christopher Allen's email to Eileen Kohler (Lionsgate Human Resources) and to Jack Carey (SVP of Operations at TV Guide Network). I also made note of this police report in Lionsgate's online compliance web portal that is run by a NAVEX Global company called EthicsPoint. EthicsPoint is overseen by Richard Prell, Lionsgate's Compliance Officer.

Note #40: Detective Allen's email said that I had been sending Mr. Nalepa unwanted messages. Yet it was Mr. Nalepa who had been broadcasting to me. I have no broadcasting equipment in my possession. I wouldn't even know how to use such machinery. When Eileen Kohler nor Jack Carey had gotten back to me, I did not return Detective Allen's telephone call or email (Detective Allen can be contacted to tell us what the complaint made about me was.)

Note #41: Michael Nalepa's complaint might have been that I had once telephoned Michael Nalepa's parents, three months earlier, back around November 5, 2013. Throughout that early November morning, Michael Nalepa's satellite assaults had brutally hurt my body and I would not have called asking Marie Nalepa if she could have her husband talk to their son about Tricia Daniels had I not met Tony and Marie Nalepa when they visited TV Guide Network's Hollywood office almost three years earlier. I told Marie Nalepa that she had a terrific son. Tony Nalepa was not home so I could not talk to him. I asked Marie if she could have her husband talk to their son re: Tricia Daniels and Michael's broadcasting and told Marie Nalepa that her son had worked at TV Guide Network with me, but not since 2011. I told her that my employment at TV Guide Network ended in May 2011 while Michael Nalepa's employment ended in January 2011. I thanked Mrs. Nalepa for talking to me, I was even crying as it hurt me to have to place the call, but I again told her that she raised a terrific son.

Note #42: That early November morning the force and amount of Michael Nalepa's repeated satellite assaults could have seriously broken bones in my body. That day was one of the many days when I just needed Michael Nalepa to stop. The torture and pain to my body was too much for my bones to take.

Note #43: On Wednesday, November 6<sup>th</sup>, 2013, Michael Nalepa placed a telephone call to my sister's apartment in New York and left a message with my sister for me to call him. It seemed so strange that he'd call my sister when he and I were "glued" together "Live" via satellite that day. Certainly if Michael Nalepa had wanted to break 'the fourth wall' and call me by telephone, he certainly had my cell phone number.

Note #44: In November 2013, I was not yet aware of Michael Nalepa's Bipolar Disorder. On November 6<sup>th</sup>, 2013, it was so odd to me that Michael Nalepa didn't reach out to me

#216

directly and chose to reach me through my sister that I decided to email him rather than call him back via telephone. And again, he was "glued" to me "live" that day via satellite by TV Guide Network's satellite broadcast. Between November 6 and November 7, 2013, Michael and I exchanged a few emails. The final email of Michael's I didn't answer back because I felt that there was no reason to even respond to it.

Note #45: About two days later, I received an 8x10 envelope via U.S. Priority Mail from Michael Nalepa. He paid \$5.60 postage to send it to me. On the envelope my address as well as his return address were handwritten....but I noticed something funny. I noticed that his return address on this envelope was his past address, it was not his current address. So I did not open this envelope. To this day, I have this envelope in my possession unopened and it feels like there are one or two pages inside. I feel bad that Michael who was unemployed at this time spent the \$5.60. I don't know what's written inside but I'm certain that he was under a great deal of stress during the month of November 2013, as he had been hosting and producing TV Guide Network's Satellite broadcast for just short of 13 months at that time.

Note #46: Here is a new piece of information that Michael Nalepa revealed to me on July 27, 2015 at 2:06am. (With Michael Nalepa's 34<sup>th</sup> Birthday having occurred, and with Michael knowing due to the always-on satellite broadcast that I am about to file for Arbitration, perhaps this new reveal of information was Michael Nalepa's early birthday present to me. On September 14<sup>th</sup> I will be celebrating my 55<sup>th</sup> birthday). On July 27, 2015, Day # 1798 of this continuous, continuing, torts crime event, Michael stated several times that "he is making electricity through the transponder and sending the electricity to Tricia Daniels through the satellite downlink." This is the scientific basis for how I get burned.

Note #47: As the victim of this continuing, continuous crime, what has also started to become apparent during late 2014 to the present is that the group of co-workers known as "The Rick Saloomey Team," also known as the "Core Group Family" broadcasting team were not exactly the 'honest joes' that they made themselves out to be on their broadcasts to me. These are the broadcasting voices known to me as Rick Saloomey, Laura Slobin, Carla Hawkes, David Park, Tom McMahon and Steve Sabellico, all whom were my former TV Guide Network co-workers.

Note #48: From December 26, 2010 through October 15, 2012, the "Rick Saloomey Team"/"Core Group Family" Team kept the "Live" satellite broadcast in place. 24/7, 365 days a year. I was comforted through my own internal feelings that while Rick's broadcasting team retained control of the machinery that genital taserings and taserings to my breasts and behind would probably not return.

# 217

Note #49: While Rick Saloomey and his team retained control of TV Guide Network's broadcasting machinery, more comforting to me was that I felt his team could prevent the "surprise satellite rape" from returning.

Note #50: My body was "surprise satellite raped" non-stop on August 16, 2010 (from 1:39am to about 5:50am without interruption). Comforting to me was that if "surprise rape" did return, that Rick Saloomey's "Core Group Family" broadcasting team would be able to call Jack Carey (SVP, Operations) or Scott Woodward (Executive Vice President, of Programming and Production) or a broadcast operations employee in TV Guide Network's Tulsa, Oklahoma broadcasting workcenter, to get any new occurrence of "surprise rape" stopped.

Note #51: It was also comforting via my own internal feelings that while the "Rick Saloomey Team"/"Core Group Family" broadcasting team had control of the "always on broadcast" that chances would be slim to none that one of my family members who lived in New York City would get "surprise raped" by TV Guide Network's owned and leased broadcasting machinery.

Note #52: During October 2010 and November 2010, the threat of "surprise rape" to my New York City family members possibly occurring existed because of comments made by former co-worker Amy Sweet, when she played broadcaster (on the satellite broadcast to me.) See Note #53 C Below. Surely the terror, pain and suffering, emotional distress, and helplessness would be too much for any one of my family members to bear. Having gone through this, I know this firsthand. But due entirely to comments made by Amy Sweet in some of her broadcasts, I feared for the safety of my family as there was a threat to them that had not existed prior to her comments.

Note: #53: When she was a broadcaster, some of Amy Sweet's comments were:

- a) That Allen Shapiro (then President and Chairman of the Board of TV Guide Network) wanted my rape to be put into the script. Question: Why would Amy Sweet do this to Allen Shapiro? Why would Amy even say things like this when she knew that she was being heard "live" on broadcast satellite? Other former co-workers also were on the same satellite broadcast hearing her comments.
- b) Amy stated that there were transcripts of the entire 'Tricia Daniels' broadcast made and that the transcript company was the same vendor that TV Guide Network used when the network needed transcripts made for the network's live events red carpet shows.
- c) Amy Sweet also made remarks about "The Golden Krendal Bas Cohen Murders." My religion is Jewish. By Jewish religion, I, as well as my immediate family are

#218



'Golden Krendal Cohens.' Due to the holocaust there are few (if any) other 'Golden Krendal Cohen families' beside mine that are in known existence today. When Amy Sweet made remarks about "The Golden Krendal Bas Cohen Murders"—she caused emotionally distressing fear in me about my immediate and future safety; she also caused emotionally distressing unrest in me about the immediate and future safety of my New York City based family. I prayed that my family in New York City would not get 'surprise satellite raped.'

- d) On Saturday, October 30, 2010, while Amy Sweet was broadcasting, I heard her say that "Scott Woodward wants me raped all weekend." Amy's comment was immediately followed by what sounded like a 'computer-made Scott Woodward voice,' that was broadcast to me. I heard "rape her, rape her" being broadcast in a Scott Woodward-ish voice to me. This caused immense terror and a new wave of emotional distress to me because suddenly a new threat of the violent and brutal 'surprise satellite rape' that took place against me on August 16, 2010 was possibly about to hit me again and possibly last for the remainder of the weekend. (Thank goodness it didn't because my body was still weak and recovering from the August 16, 2010 event).

Note #54: Let's now talk more about the "Rick Saloomey Team"/"Core Group Family" team of broadcasters (mentioned above in Notes #47 through Notes #51). This team of broadcasters had control of the satellite broadcast from December 26, 2010 through October 15, 2012.

- a) When I worked in TV Guide Network's offices with Rick Saloomey, his title was "Supervising Producer." To me his title says that he is part of the management group of TV Guide Network's Programming and Production Department. As stated above, what has come to light during calendar year 2015 while Michael Nalepa and I remain "glued" together via the satellite broadcast is that Rick Saloomey and his team were not exactly the 'honest joes' that they projected themselves to be.
- b) Question-Why did Rick Saloomey and his team, keep the satellite broadcast in place? It would have been so easy for Rick to reach out to Jack Carey, or to Scott Woodward or Paul Adler to get "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" ended.
- c) Question- Why did Rick Saloomey allow Nancy Coleman, EVP of Lionsgate's Human Resources Department to discriminate against me while I was still

# 219



employed (during the months of January 2011 through May 19, 2011)? Instead, Rick could have emailed or telephoned Nancy Coleman to tell her that he needed to discuss the 'Tricia Daniels situation' with her. I feel that Rick had a managerial responsibility to let his bosses as well as let Nancy Coleman (Human Resources) know that we had a crazy out-of-hand situation at TV Guide Network involving broadcasting machinery and satellite feeds that had developed, which needed immediate solving.

- d) In mid-October 2012, when Rick Saloomey, his boss Kristan Giordano and another employee named Miguel Romo went to Brazil on assignment for TV Guide Network's Specials Department, why didn't Rick Saloomey and Kristan Giordano just end the satellite broadcast? It's now 2 years and almost 10 months since their Brazil trip and the "always on" satellite broadcast remains still "on."

Note #55: Let's now discuss another one of my former Lionsgate co-workers named Anne Alderete. (Former Managing Editor, TV Guide Network).

- a) Anne has a lot of explaining to do. As one of TV Guide Network's tortfeasors, Anne was a harasser and during her terror broadcast of 12/24/10, Anne was a sexual harasser due to her lewd comments made.
- b) Anne can detail how and why she personally used TV Guide Network's FCC License and broadcasting machinery to broadcast to Tricia Daniels in November 2010 and in December 2010.
- c) Anne can explain to us all why on December 24, 2010 she hosted and produced a broadcast which terrorized me. That night, Anne made me fear for my life, made me fear for the life and immediate and future personal safety of David Geffen, and for the life of my New York City family members. Anne that night for a couple of hours kept broadcasting "We Just Killed David Geffen and we're here to KILL YOU! No more dirty stinking fucking Jews at TV Guide Network."
- d) That night, as I feared for my life, and remained in fear for what each next moment would possibly bring while Anne was host and producer, I wondered, would I still be alive by morning? Was someone going to be shooting bullets at me through the ceiling from the apartment that was upstairs from mine? Was someone going to be making an assassination attempt on my life by shooting at me through my bedroom window? Would someone be shooting at me through my next door neighbor Lynda Noiseux's wall?
- e) I didn't know if Anne was going to "surprise rape" me! The terror, fear and emotional distress that Anne delivered that night remains unfathomable!
- f) Anne that night even mentioned in her broadcast dialogue that she was waiting for a tape of the gun-shots, (a tape that was allegedly on its way to her from

# 220

David Geffen's house) and/or was checking to see if the tape of gun shots was on its way so that she could play the audio for me imminently on her satellite broadcast (of allegedly what took place at David Geffen's house). As I write this August 2015 Notes Document, I don't remember Anne's exact sequence of words about the gun-shots. But Anne can be asked to clarify why she would do this to me. Also- the transcript from this night is possibly in the files of some of my former co-workers.

Note #56: Anne Alderete also broadcasted to me on Thanksgiving Day 2010. It was early morning and others were broadcasting to me too. That morning during Anne's Thanksgiving Day broadcast she stated that TV Guide Network's normal transcription machinery was not properly working. When she stated this, it was very distressing to me because if complete transcripts for legal or other purposes were being made by my co-workers of the 'Tricia Daniels satellite broadcasts,' then any discomforts or suffering that I'd possibly be put through over Thanksgiving 2010 would not be properly logged. Again that morning, I wondered if I'd be "satellite raped" and I prayed for rescue from my co-workers' satellite broadcast. That morning I sent an email to Nancy Coleman, Lionsgate Human Resources to log my concerns and to report the "live feeds" that were taking place to me in my apartment.

Note # 57: Now let's discuss one of my former co-workers named David Anderson. David Anderson also used TV Guide Network's FCC licensed broadcast machinery (during Fall 2010) to transmit, host and produce audio that was beamed to me. How does David explain his use of company assets? To his credit, David never harassed. When David was at the microphone he was a good host and producer and we had intelligent conversation. It was a lovely break from all of the harassment, tasing of my genitals, and lewd comments that took place when other co-workers had control of the broadcast.

- a) David can detail which TV Guide Network satellites he was logged into, which broadcast frequencies he was using, what microphone equipment he was using to broadcast his audio to me. David can detail how anywhere to everywhere I went, TV Guide Network's Satellite broadcast stayed with me.
- b) It would be interesting to hear David explain why he feels this broadcast exists, what was the personal gain he was promised, who from TV Guide Network Senior Management knew about this 24/7/365 "Tricia Daniels Broadcast" and more. David Anderson's former direct boss Scott Woodward (TV Guide Network's Executive Vice President of Programming and Production) was also my boss from 2006 through 2010.
- c) Lisa Germani became my boss in January 2011 when Nancy Coleman of Lionsgate's Human Resources Department assigned me to Lisa. As mentioned other places in my documents, Strangely, Lisa Germani should never have been allowed to manage me or anyone because allegedly Lisa didn't have the California State Law required sexual harassment training.

# 221

- d) Did my former boss (David Anderson's boss) Scott Woodward know about the tort crimes taking place? Did Scott and fellow Vice Presidents Jack Carey and Paul Adler condone employee criminal behavior?

Note #58: It's now August 2015, and I have some further comments to make about former co-worker Amy Sweet (who I discussed earlier in this document in Note #52 and Note #53).

Questions:

-Why did Amy participate in these "Tricia Daniels broadcasts"?

-What Senior Management person at TV Guide Network authorized her or assigned her to this project? Amy's job title was "Writer."

-How much information did Amy know about how my eyesight was being damaged by the satellite technology?

-Why wouldn't Amy Sweet and everyone else not call Lionsgate's Human Resources Department and report that there was a problem here at TV Guide Network that was out of control? Isn't it their duty (according to Lionsgate's Employee Handbook) to report criminal activities?

-How could Amy, allow TV Guide Network to keep this technology on me? "Surprise rape" could have returned at any moment! In November 2010, I was still being assaulted by tasers, even during sessions when Amy was broadcasting to me. Why would Amy not be able to get Senior Management in 2010, such as Jack Carey, Scott Woodward, Paul Adler, and Kristan Giordano to stop the harassment broadcast?

Note #59: Why would Amy Sweet or any of my co-workers not be able to get help from Human Resources or from Senior Management that could have put a stop to my terror-filled "satellite kidnapping" when I was kidnapped for 49 days (from wake-up on the morning of August 24 or 25, 2010 through late afternoon on October 12, 2010). My 'satellite kidnapping' took place during the beginnings of this whole "event." I was 'kidnapped' by mostly male voices that I did not recognize.

Note #60: During these 49 days while I was in the imprisoned state of kidnap by voices that I did not recognize, I was kept in an on-going state of terror. What did these people whose voices were unknown to me want with me? What was the end result that my kidnappers wanted? When would I be released? Would the torture and barbaric act of "satellite rape" return? My body would not be able to survive that again as I remained in a weakened state from the event of August 16, 2010.

#222



Note #60A: During my kidnapping, I was a 24/7 victim of one big “Interactive Human Game,” and various comments, including lewd comments were specifically broadcast to me to keep me in a state of terror, to humiliate me, to sexually harass me and to just keep me on a roller coaster of emotional distress where my personal safety was threatened. I never knew what the next moment would bring as my satellite kidnapping continued.

Note #61: I spent my 50<sup>th</sup> birthday (on September 14, 2010) not in celebration but instead as a victim of this “Satellite Kidnapping” by a group of “live” voices that I did not recognize. I wouldn’t learn until October 12, 2010 that all of this was done using TV Guide Network’s broadcasting machinery and that it was my co-workers who did this thing to me, somehow using audio equipment to conceal their real voices.

Note # 61A: TV Guide Network’s broadcasting machinery assets are supposed to be used to broadcast TV shows into viewer’s living rooms, not to commit tort crimes with. (As the months from 2010 until now have ticked on, different co-workers have said during different eras of the on-going satellite broadcasts that their tools used were TV Guide Network’s owned and leased satellite and broadcast operations machinery.)

#### Lionsgate’s Employee Manual

Note #62: The Lionsgate Employee Manual spells out all of the policies and procedures that TV Guide Network employees were supposed to follow. The Lionsgate Employee Manual also had printed instructions for what employees should do to report uncertain and difficult situations. It was from this section that I obtained Richard Prell’s name.

Note #63: I received my copy of the Lionsgate Employee Manual via email from Bonnie Barrio on Friday morning February 6<sup>th</sup>, 2009. Bonnie’s position was Executive Assistant to Ryan O’Hara who was then President of TV Guide Network. Bonnie sent this Lionsgate Employee Manual to all TV Guide Network and Online Hollywood Employees because that day there were to be two different “new hire” meetings that we all needed to attend.

Note #64: On Friday, February 6, 2009, Lionsgate Human Resources held two meetings to welcome us to the company. The first meeting took place at 11:30am on the 6<sup>th</sup> floor. It was a “New Hire” orientation meeting.

Note #65: The second meeting that took place on Friday, February 6<sup>th</sup> 2009, at 1:30pm, was a “Form Filling-Out” and Benefits meeting that was run by Randy Young (of Lionsgate’s Human Resources Department). In Randy’s meeting, which was held in the 7<sup>th</sup> floor ‘Hollywood Conference Room’ we signed the forms that had the JAMS arbitration clause.

Note #66: Other clauses that Randy Young went over were company policies about confidentiality, trade secrets, and Lionsgate’s employee computer use policy. During this

# 223



meeting I and my co-workers received our Medical Insurance forms, our "Welcome to Lionsgate" folder and Randy specifically said to all in the room that Lionsgate has a No Sexual Harassment Policy!

Note #67: Randy pointed out that inside our "new hire," "Welcome to Lionsgate" folders there was a pamphlet titled "Sexual Harassment Hurts Everyone" that detailed how "Sexual Harassment" was prohibited by this company. The pamphlet outlined Lionsgate's Sexual Harassment policies, detailed State and Federal Law and gave reporting directions to employees. (I still have my "Welcome to Lionsgate" folder and I have my copy of this pamphlet.)

Note #68: A short matter of days after our February 6, 2009 meetings, Lionsgate's Human Resources Department sent one of their employees with a clipboard to each TV Guide Network employee's desk. We each were asked to sign our signature next to our name. (Human Resources at Lionsgate wanted us to certify by placing our signature next to our names that we each read the Lionsgate Employee Manual and understood the company policies.) Lionsgate is a public company, I had indeed read the Employee Manual and understood the policies so I had no problem signing my name.

#### Next-Door Neighbor Harassment

Note #69: Lynda P. Noiseux is one of my former neighbors, from when I lived at Doheny Drive Apartments (1015 N. Doheny Drive, West Hollywood, CA 90069)

From August 2008 through mid-December 2010, Lynda lived next door to me and I am certain that Lynda has quite a story to tell about all of her alleged interactions with my TV Guide Network co-workers.

Note #70: Question-What did TV Guide Network promise to Lynda? Why would Lynda, a young mother who did not work at TV Guide Network have satellite access where her voice was broadcast to me as harassment from late August or early September 2010 through mid-November 2010? Lynda broadcast incredible things and at all hours. Why was Lynda repeatedly talking about having a friend of hers named Mark break-in through my window to rape me in my sleep? Why did Lynda say that Lisa Germani of TV Guide Network hired her? Why did Lynda say that 'Lisa Germani wanted me to get ovarian cancer, breast cancer, brain cancer and wanted me beheaded?' (Note: In 2010, it may have actually been Michael Nalepa who was ratified by Lisa Germani to communicate with Lynda!)

Note: #71: Questions-

-Why would Lynda help my TV Guide Network co-workers to terrorize me?

-Did Lynda help setup a robbery or two of my apartment between June 2010 and August 2010?

# 224

-Did Lynda on Friday night, August 13th, 2010 work with TV Guide Network co-workers to set-up the harassment "terror" installed on me that night?

-Lynda has so much to explain including if TV Guide Network gave her access to their privacy rights invasion facts about me. Why would Lynda my next-door neighbor commit tort crimes against me?

- Why would Lynda be broadcasting along with my coworkers, using TV Guide Network's broadcasting machinery?

Note #72: Today, on August 3, 2015, I also think about the fact that I am a victim of AGE DISCRIMINATION: On May 19, 2011, my age was 50 years old and 8 months. It was my final day of employment with Lionsgate/TV Guide Network. I received from Human Resources by UPS (United Parcel Service) an "employee termination packet." Included in my packet, was a one page black and white document that had the TV Guide Logo on top that someone printed from their computer. It was an official required ADEA (Age Discrimination In Employment) document that the company was required to include, perhaps due to Federal Law.... and there were a couple of BIG problems with this ADEA required document.

Note #73: The Problems with the ADEA required document were:

Problem #1: I was over 50 years old and the document showed me that Lionsgate was favoring the company's younger employees by keeping them employed instead of me. Especially in my department, The Talent Department.

Problem #2: The ADEA required document was not an accurate accounting of who actually worked in my department at TV Guide Network at that time. For instance in my department, a young twentysomething Talent Department Assistant (named Nell Lanman) was somehow completely left off of the document.

Problem #3: Lionsgate was terminating my employment but they chose to keep the employment in place of my 45 year old department co-worker. This 45 year old worker would have been named Fernita Wynn!

The very big problem here was that Fernita Wynn's employment at TV Guide Network had actually been terminated some 10 months earlier. Fernita's final day with Lionsgate took place on either Tuesday, July 20, or Wednesday, July 21, 2010. Fernita resigned to take a job in a different company. In May 2011, I'm being terminated with an official ADEA document sent to me and Lionsgate is keeping Fernita Wynn employed when she doesn't even work there and had not worked there in just under 10 months! It made no sense!

Problem #4:

I was over 50, and I know that Lionsgate is an At-Will employment company. But in both my termination packet and in the telephone call that took place to me in early May 2011

# 225

where Paul Adler and Eileen Kohler of Lionsgate Human Resources told me that I am being terminated, there was no other information re: the factors that the company used to pick me. I was a shining star of the company, I was always thanked for all of the good work I did, Thanked for how much I cared about the company, I was thanked for always delivering, for constantly exceeding expectations. I was a doer! A difference maker! I delivered for the company each and every day. My termination made no sense! Why was I selected for layoff!? Daily, I was one of the employees on the front line of the company delivering success!

Note: #74: Additional Brief Notes:

- a) Have you ever been burned inside of your vagina by Lionsgate's broadcasting machinery? It's not pleasant but this has happened to me, most recently on July 31, 2015.
- b) After Lisa Germani and Fernita Wynn's employments ended, for some reason, their workplace emails were left "on" And according to Michael Nalepa, he was able to use both of their workplace emails to continue interfering with my life. Michael's recent admissions were made these last few months to me on the "always on" satellite broadcast. Michael says that he interfered with my TMZ employment in spring 2012 when he sent emails from Fernita Wynn of TV Guide Network to TMZ to intentionally hurt my employment. Michael's admission certainly explains why I didn't work for TMZ for too long. The whole shame of this is that I was the perfect hire for TMZ, I did an excellent job, and I had found so much new career joy in my new job there as Talent Booker for TMZ.
- c) Once, during late 2012, I was able to see a mass of electricity coming down through the ceiling of my West Hollywood apartment. It was a bolt aimed at me and I got badly burned on my hand as I tried to run away from it. Around the same time, I got burned by sparks that came out of my home computer to burn me. Michael Nalepa was somehow suddenly able to satellite in electricity and create static electricity from Lionsgate's broadcasting machinery in concert with Intelsat's satellites and send it down to my body that I had not previously experienced up to this time. It may be through the science of Electromagnetism. (Michael Nalepa has these exact technical architecture answers).
- d) Michael Nalepa from November 2012 to the present is also able to manipulate satellites to spark me when he combines satellites with power sources that are nearby to my body. Lionsgate's broadcasting machinery in concert with Intelsat's satellites are already able to burn my body on their own, but now a recurring new thing had started, Lionsgate's broadcasting machinery and Intelsat's satellites were suddenly able to interact with electricity from ground-based power sources, such as working air conditioners, working jacuzzi's, passing motorcycles, from the working car engine of my Toyota automobile. From working desk fans and from other sources. These sparks, heated blowings, direct hit burnings and how they are achieved using satellites can be explained by Michael Nalepa.

# 226



- e) Even when I am in my bed at night and not near working power sources, Michael Nalepa is able to burn my body, using multiple satellite beams from TV Guide Network's satellite transponder to broadcast burning stuff at different wattage levels to my body. At times, the wattage that has hit my body was very painful, left red burning marks, left golf-ball sized blobs on my legs, left smaller red marks on my chest and of course there's my burn bump (see pictures). At other times, Michael tries to control the wattage so that I don't get hurt too badly. (He has around-the-clock wattage control).
- f) According to the 'Rick Saloomey Team,' when they were broadcasting in 2011, Lisa Germani's misuse of satellites, as well her tortuous behavior was a widely known fact, among TV Guide Network's management employees. Question- Why did TV Guide Network's broadcast operations employees allow Lisa's widespread and open nature of misconduct to continue instead of terminating her access to satellites?
- g) In 2011, the "Rick Saloomey broadcasting team" also said that Michael Nalepa has continued satellite access to broadcast into my apartment building. But that Michael only had access to broadcast-in "the sounds of my upstairs neighbor." At the time, it sounded odd to me that management of TV Guide Network would possibly allow Michael Nalepa whose employment ended in January 2011 to retain access to Lionsgate's broadcasting assets. But at this time in 2011, so much outrageous activity with Nancy Coleman of Lionsgate's Human Resources Department had occurred and so many company emails of employees who were no longer with TV Guide Network remained in operation, that it seemed possible that Michael Nalpea possibly had some sort of deal with Lisa Germani to retain access to broadcast satellites and their associated earth stations, transmission paths, etc. Lisa a few times on the telephone, when she became my boss in 2011, told me that she was trying to get Michael Nalepa hired back. Once Lisa said that she had spoken to her boss, Paul Adler about it.

Note #75: To give all reading this document more of an exact picture of the levels of Pre-Meditated Intentional Infliction of Emotional Distresses that I was put into by my co-workers, here are some instances that I will try to describe to you....

Intentional Infliction of Emotional Distress #1:

Imagine your life was about to end at any second (and you couldn't escape, couldn't even call 911 for help). In October 2006, and in August 2010, September 2010 and December 2010, members of TV Guide Network's Programming and Production Division using TV Guide Network's broadcasting machinery and company satellite transponder assets, put me into elongated situations of sheer terror and situations where it seemed that my life was about to end.

# 227



According to Michael Nalepa these "Interactive Human Games" were designed to cause me to go into cardiac arrest because Lisa Germani wanted to be 'David Geffen's Secret Wife' and because Michael Nalepa wanted to be 'the boy in the parking lot.' Michael has discussed that Lisa and Michael needed me gone from TV Guide Network and gone from (my residence) Doheny Drive Apartments and it would look like I had died of natural causes, no forensic evidence would be found. Yet the weapons that would have secretly caused my death would be the broadcasting machinery normally used to beam TV Guide Network's TV Shows into viewers' homes.

-On October 26, 2006- my body went into some sort of shock due to an 'Interactive Human Game' being played on me for hours via co-workers that night. Michael Nalepa has admitted that he and Lisa Germani were the ones responsible for this. The event was premeditated and designed to cause me to go into cardiac arrest. In addition to the state of shock, my body also went into a state of unconsciousness during this event.

#### Intentional Infliction of Emotional Distress #2:

Fear, Terror, Pain and Suffering

-Fear, Terror, Pain and Suffering for me was a daily affair from August 24 or August 25, 2010 through December 24, 2010. From the end of September 2010 through Mid-November, my female body parts were being painfully vibrated and tasered by the "always on" satellite broadcast and by my co-workers who were broadcasting their "live" voices to me as I was being tasered. In addition to being painful, it was humiliating. I lived in constant fear that "surprise satellite rape" would return and I lived in constant fear that new taserings to my genitals would occur. It was sexual assault! While this chapter took place, my TV Guide Network co-workers just wouldn't stop.

-Fear, Terror, Pain and Suffering returned two years later, in November 2012 and in December 2012 when a whole new level of intentional infliction of emotional distress started. Suddenly my body was being hot-spot burned, electroshocked, muscle-bashed and this new type of assault was also being delivered via the use of TV Guide Network's broadcast satellites to my body. Also, my eyes and body developed a more intense sensitivity to lighting then had previously existed.

Once in November or December 2012, as I was driving my car and making a left turn onto Cynthia Street in West Hollywood, I got assaulted while driving as a satellite blast from TV Guide Network's transponder hit my heart with blunt force. At other times between December 2012 and spring 2015, my body, including my driving/breaking leg has gotten assaulted, via taserings and satellite slaps while I have been driving a car on a crowded Los Angeles freeway, as well as in New York City on a major road.

# 228

Throughout 2015- there have been many days that I still have had emotional distress as I get an assortment (depending on Michael Nalepa's whims of the day and probably due to his Bipolar Disorder) of hot-spot burns, electroshocks, muscle-bashing, and sexual vibration inside my vagina due to arrive to me from TV Guide Network's broadcasting machinery. Sometimes it's due to Michael's own frustrations that things didn't turn out the way he thought they would and that he has no idea re: 'how to end this.' Michael has stated many times on the broadcast that quote- "Michael Nalepa is not ever going to be able to understand why he did this thing."

Intentional Infliction of Emotional Distress #3:

Terror from my Elevator Ride with Greg Hughes (Director of Operations, TV Guide Network) on August 16, 2010 (late afternoon)

It was like I was in the elevator with 'Jack The Ripper.' The way that Greg looked at me, his body and eyes were frozen on me with a Stone-Cold Killer/Jack The Ripper look.

Today in August 2015, I have to ask---had Greg been professionally hypnotized? What was it that put Greg into a stone cold killer trance? Was it a new 'Interactive Human Game' designed by co-workers to give me cardiac arrest?

During our entire elevator ride, I didn't know if Greg was about to thrust out to assault me or rape me or strangle me by breaking my neck. I was terrorized!

On this day, I was already in such bad shape as I had been satellite raped for 4-plus hours. I was already terrorized that the satellite rape would return at any time and that I would be brutally hurt again. Now suddenly, I was praying that I would make it alive from the 6<sup>th</sup> floor down to my car on Level P-2, or to the lobby of our Office Building.

Idea: Perhaps TV Guide Network or CIM Building Management has actual elevator footage in their archives from August 16 2010 --late afternoon.

Once Greg exited the elevator (in the lobby) I was scared of what the future was going to be like working with Greg Hughes at TV Guide Network after something like this happened. Was Greg Hughes out to kill me or terrorize me? Was Greg involved in the satellite rape I had just gone through?

It's now August 2015 and Michael Nalepa (over two years ago, on July 14, 2013) confessed that it was Michael himself who did the Satellite Rape on me. But what would cause Greg Hughes to go into some sort of 'Stone-Cold Killer Trance' and purposely get into an elevator that I had just gotten into where we were the only two people in this elevator? (Michael Nalepa has information on this. On July 14, 2013,

#229

Michael hinted that Greg received an email from Lisa Germani with instructions...but that the email from Lisa was actually written and sent to Greg by Michael Nalepa who had been ratified by Lisa Germani 'to get Tricia Daniels out of TV Guide Network.').

Note: This elevator ride was not the first strange situation that I had with Greg Hughes. During Fall 2009, when the office lighting and most lighting in general (fluorescents, home lighting, car headlights, street lights, store lighting) became unbearable to my eyes, Greg Hughes in his job as Director of TV Guide Network's Operations Department was one of the staff assigned to help me find a more comfortably lit cubicle/workspace that I could move into at TV Guide Network's Hollywood offices.

There were some empty cubicles on the 6<sup>th</sup> floor and Greg who was supposed to be helping me suddenly became very abrupt. Suddenly it was like I was talking to a different person. I can't remember the exact words that Greg stated, but suddenly while talking with Greg, it seemed that he was trying to rev me up into suing the company. It was the strangest thing. I loved Lionsgate, I loved TV Guide Network, and there'd be no reason for me to sue the company.

Now in August 2015, we know that all Greg Hughes needed to do on that fall 2009 day was to talk to Lisa Germani and to order Lisa to remove Broadcast Satellite Monitoring from Tricia Daniels' person. This would have immediately cured my intolerance to lighting situation and I could have then kept the cubicle I already had. I feel that as Director of Operations for Lionsgate's TV Guide Network that it was Greg Hughes' job and the very scope of his employment to protect employees as well as protect Lionsgate from facilities and technology wrongdoings. Michael Nalepa can explain how the amount of satellite monitoring assigned to my person in fall 2009 wreaked havoc on my eyes. Greg could have cured this but instead he and Lisa kept me suffering.

#### Intentional Infliction of Emotional Distress #5:

In November 2012 and December 2012--Emotional Distress from Sleeplessness

I was able to sleep on my own just fine but due to the middle of the night satellite burning, electroshocking, muscle-bashing and tasing administrated to my body by former TV Guide Network co-worker Michael Nalepa, using TV Guide Network's broadcasting machinery I was put through some distressing and painful nights.

In November and December 2012, I hadn't worked at TV Guide Network for 18 months, Michael Nalepa hadn't been an employee of TV Guide Network since January 2011—but 'the Tricia Daniels Show' was still on. Lionsgate's TV Guide Network was still paying to give me a whole new chapter of intentional infliction of emotional distress.

# 230



Intentional Infliction of Emotional Distress #6:

Exacerbation by TV Guide Network co-workers (in August, September, October, November and in December 2010) via the satellite broadcast of anything that could possibly cause me any sort of intentional infliction of anxiety, anguish, bitterness or emotional distress.

Including But Not Limited to:

- a) Making me feel humiliated, embarrassed and degraded, like a piece of trash that was of no further service to the television industry. Even co-worker Laura Slobin (a writer) became a tortfeasor and broadcaster. One night Laura committed sexual harassment when she stated "Tricia Daniels has a big vagina" and due to the use of enhanced audio equipment, Laura's comment was broadcast in a big way. Once one of the broadcasters stated that Jack Carey emailed nude footage of me to Ryan O'Hara in New York and also to Matt Singerman (one of my former TV Guide Network bosses). I was not aware that any nude footage of me existed and at the time of this writing, I'm pretty certain that this was made up to give me emotional distress.
- b) Nancy Coleman (EVP, Human Resources of Lions Gate) was going to be receiving \$3 Million Dollars from David Geffen's will and that Rochelle Kasten (a member of Nancy's Human Resources Department) was going to receive \$200,000 from David Geffen's will in a deal struck with them by Lisa Germani.
- c) In late August 2010, during my 49 Day kidnapping powered by voices that I did not recognize, there was talk from the 'kidnappers' (which were my co-workers using some sort of masked computer voices) via 'their satellite broadcast' that Lisa Germani, earlier that month, wanted me to arrive dead in a box (coffin) to New York for my father's 85<sup>th</sup> Birthday which would have given him a possible heart attack. (My father's 85<sup>th</sup> Birthday was August 17, 2010).
- d) In Fall 2010, voices were broadcast of my brother Michael, of my mother and of my father. These family voices were only used a few times by co-workers during the satellite broadcast.
- e) During the first weekend of October 2010, TV Guide Network co-workers allegedly used Fernita Wynn's email to ratify one of my sister-in-law's who lived in New York to ask me questions where she was trying to bait me into saying something bad about Lionsgate on the satellite broadcast. Fernita Wynn had not been an employee since July 20, or July 21, 2010 but her company email was "left on" and one of my co-workers felt ratified in using Fernita's email to reach out to my sister-in-law.

# 231



f) On August 18, 2010, a David Geffen voice was made by TV Guide Network co-workers and used on what we call "Richard Sherman Day" from the apartment above mine. But when this David Geffen voice didn't sound at all like David Geffen to me, the voice was soon retired from use. That day there was also a Richard Sherman voice, an obit, a transfer of power and strangely, a voice of a David Geffen companion who seemed to be some sort of an owl voiced alter-ego. It was bizarre! I navigated through it all. (Note: Richard Sherman is a long time employee of David Geffen)

g) On the satellite broadcast in Fall 2010, it was repeatedly said that Lisa Germani was going to be receiving \$150 Million Dollars from David Geffen's will and that Lisa had told co-workers that Allen Shapiro wants them to participate in the live satellite broadcasts that are being broadcast to Tricia Daniels. It was often said that some of these co-workers thought that they would be getting money from Lisa when she received the \$150 Million Dollars (or more) from David Geffen's will.

h) In Fall 2010, there were three interrogations of me by a group of male investigator type voices that I didn't recognize. All done via the Satellite Broadcast. Two interrogations were about former Gemstar-TV Guide CEO Rich Battista and an alleged possible insider-information stock scandal. The other interrogation of me was about DVD's where I gave great insight and lots of great information that the studios' DVD departments can learn from.

i) In Fall 2010, there was talk from 'the kidnappers' on the satellite broadcast that Michael, an employee from The Malibu Beach Inn (a hotel which was then owned by David Geffen) was sending a car to pick me up to take me out to Malibu but I'd never make it to Malibu because the car that Michael was sending was going to be getting into a pre-arranged car accident that night once I was inside.

j) There were nights when I was at home in my apartment when the 'Richard Sherman' voice seemed to be in charge of the satellite broadcasts and he was communicating with Lynda Noiseux, my next-door neighbor at Doheny Drive Apartments. And Lynda was communicating back to Richard in "Live" real time conversation that TV Guide Network's satellite broadcast was broadcasting to me in my apartment.

k) In November 2010, co-workers kept asking each other on the "live" "always on" satellite broadcast- "Is she f-cked up yet?" It seemed that co-workers were upset that I wasn't 'f-cked-up' and that they wanted to keep their 'Interactive Human Games' going on, until my life was totally ruined. It was said repeatedly that Lisa Germani wanted me to be broke, blind and destitute. And it was also inferred that co-workers wanted me to commit suicide, and if that couldn't be, then inferred that Lisa Germani wanted me to have some sort of documented mental illness so she could later claim that I hallucinated the 'Interactive Human Games' that were played on me on October 26, 2006 and all of

# 232

the games played on me during 2010. It was inferred that Lisa wanted to have support materials and witnesses that would support her future statements that 'Tricia Daniels has some sort of mental illness'—which I don't have at all. Furthermore, I have never had any mental illness nor mental health issues during my entire life.

l) But when Nancy Coleman (Lionsgate's EVP of Human Resources) started playing along in January and February 2011 saying to me a few times on the telephone while we were conversing that quote "The Company wants for you to take Psychotropic Drugs"---well, that was when it was apparent that Nancy Coleman had a Lionsgate Human Resources mess on her hands that she just didn't know how to clean-up. Nancy had already discriminated against me so much and she just kept up her discrimination of me. Sadly, for the remainder of my employment, Lisa Germani's "Lick My Dick" sexual harassment comment made to Michael Nalepa on October 15, 2010 never got erased from my file and properly put into Lisa Germani's employment file, by Nancy Coleman.

Interestingly, In January 2013, ...As part of my Lionsgate Worker's Compensation claim, The Hartford Insurance company sent me for a mental health examination/evaluation to Dr. Jerome H. Franklin, M.D. in Beverly Hills who specializes in Psychiatry and Neurology (His Telephone Number is: 310-276-0809). When I paid my visit to Dr. Franklin in January 2013 the conclusion was just as Dr. David Zakin two years earlier had concluded—that I am in A-Plus Mental Health. Dr. Franklin did recognize the extreme lighting sensitivity that my eyes and body had developed but said that he hoped in time that the lighting sensitivity condition will improve or will get easier to live with.

m) David Geffen is also a victim of Sexual Harassment by TV Guide Network employees. On the Satellite Broadcasts, starting the last weekend of October 2010, TV Guide Network co-workers repeatedly stated that Paul Adler, (VP of Production) told TV Guide Staffers that he (Paul) had sex with David Geffen when Paul first moved out to Los Angeles and that \_\_\_\_\_! Note: I'm purposely leaving out the next line that was repeatedly said on the satellite broadcast by TV Guide Network employees because it was so vile.

n) Michael Nalepa has answers re: my layoff. In May 2011 it was said by different former co-workers that my layoff was a "Happy Birthday Present to Lisa Germani." (Lisa's birthday is May 9<sup>th</sup>). At the time of my layoff it was "The Rick Saloomey/Core Group Family" broadcasting team who repeatedly said this to me via the satellite broadcast.

#233

# Claim and Relief Sought By Claimant

---

Prepared by

Tricia Daniels, August 3, 2015

I'm not an attorney but may I seek the following relief?

1) A permanent disconnect from Lionsgate's owned and leased broadcasting machinery that commits assault and battery to my body.

2) As requested in my two letters to Richard Prell, (Lionsgate's Compliance Officer), I seek an explanation or show-and-tell of the technical architecture and science that allows Lionsgate's owned and leased broadcasting machinery to even be connected to me. (Former Lionsgate/TV Guide Network co-worker Michael Nalepa is the most knowledgeable in this area).

3) Also requested previously to Richard Prell, I seek an emergency contact or phone number of someone who I can call so if there's a next time where I get barbecued by broadcast satellite machinery, I can immediately reach out to that emergency contact for immediate help. (Perhaps it's someone in Intelsat's 24/7 satellite operations center?)

4) I feel that Compensatory Damages and possibly Punitive Damages and possibly lost wages and lost future earnings are due to me for damages that I describe in my "Nature of Dispute Document Packet." However, at this time a 'damage calculation' cannot be more specific without the discovery that will happen during Arbitration. I feel that Discovery Fact-Finding will allow Lionsgate and the JAMS Arbitrators to render a fair resolution amount of damages from my claim at that time.

5) On the internet I found 4 terms from the legal arena: respondeat superior liabilities, vicarious liabilities, qui facit per alium facit per se liabilities and employer ratification liabilities. I look forward to working together with David Mandell, the JAMS Arbitrators and my Lionsgate family on a fair resolution.

6) Discovery Fact-Finding will also allow Lionsgate and the JAMS Arbitrators to render their verdicts about: What percentage of liabilities and their settlements are the direct responsibility of Intelsat (Lionsgate's satellite vendor) to settle with me.

#234

7) There's also, what to do about David Mandell's "Cease & Desist" email to me. Do we leave it in place slightly altering its terms? Do we remove it completely at the completion of arbitration? I have spent my entire career since the age of 16 years old working in broadcast television as a Talent Booking Producer, and I remain connected to many former co-workers through social media websites such as Facebook, LinkedIn and Twitter. It's inconceivable to me that as the rest of my life continues that I can avoid running into my former Lionsgate/TV Guide Network co-workers.

8) There's also Michael Nalepa to discuss. Michael Nalepa and I have been "glued" together via the "always on" broadcast satellite for more than 1022 consecutive days now.

#235



**Notes to David Mandell, to the JAMS Arbitrators and To My Lionsgate Family:**

- a) Below is the text of Letter #2 that I mailed to Lionsgate's Compliance Officer Richard Prell in early January 2014.
- b) I have one correction to this document that belongs to #12D.

In addition to Steve Rubell, I once had some small conversation about David Geffen's parking lot with Shelley Ross, when she was Executive Producer of ABC-TV's "Good Morning America." This took place in November 2001.

Also, I had some conversation about David Geffen's Parking Lot once during lunch with a singer-songwriter and his pal that I was working with. We were at Jerry's Deli in Los Angeles, CA. This took place just before Christmas in December 2000.

Signed: Tricia Daniels

Date: August 3, 2015

If Richard Prell and Lionsgate gave me an assignment today (January 5, 2014) to write a letter to former co-worker Michael Nalepa where I could say anything that I wished to say to Michael, here is what I'd write and submit to Lionsgate. (Note: My intent in creating this letter draft is to provide Lionsgate with information about what the company can ask Michael Nalepa and other current and former employees for further detail about)-- Tricia Daniels

**Notes for Richard Prell and Lionsgate re: Tricia Daniels**

**Dated: January 5, 2014**

To: Mr. Richard Prell  
Compliance Officer  
Lions Gate Entertainment Corp.  
2700 Colorado Avenue  
Santa Monica, CA 90404

#236:

January 5, 2014

Dear Michael:

You need to surrender yourself and surrender your broadcasting equipment to Lionsgate immediately. You also need to surrender your technical architecture and assault recipes (i.e. - the recipes for how you commit your assaults on me using TV Guide Network's leased and sub-leased satellite transponders as satellite weaponry.)

**Here are a few kind personal words that I'd like to say about the Michael Nalepa that I've come to know.**

Michael, you are a good person who sadly got caught-up in Lisa Germani's web. Michael, when you tell the truth, no one tells the truth with more honesty then you do. Your honesty is a trait that remains unparalleled in others.

Michael, you are a former honor's student who joined TV Guide Network (in 2006) a few years after your college graduation. And you were either put into a situation or manipulated by Lisa and by others at TV Guide Network who were playing a 'David Geffen Game' that was unknown to me, and started before your employment began.

Michael you still have so much in you to contribute to Hollywood and to society. Since 2006, you've seen some of the worst of Hollywood in what employees of TV Guide Network revved you up to do and in what Lisa manipulated you to do. But I hope that in me, Tricia Daniels, you have seen some of the best of Hollywood and that once satellites are removed from your control that you'll continue on the path that you originally came to Hollywood for.

Michael you have your own story to tell about how Lisa Germani recruited you, revved you up and gave you the technology and tools to become "The Satellite Molester." You have been broadcasting via Lisa's always-on "Privacy Rights Invasion Satellite Media Tour" 24/7 since October 16, 2012 (you've admitted this is without any pay from Lionsgate, without any pay from Lisa via her production company LMG Productions, and without any paycheck from TV Guide Network.) Note: At times it has seemed that you have had a few 'John or Jane Does' broadcasting with you (whose identities remain unknown to me).

**Now for the other stuff:**

Michael-Once upon a time there was 'the ice age, the stone age,' 'the computer age'...and now technology has put us into a modern age that YOU, Lisa Germani and other TV Guide Network former employees have pioneered that I am going to name 'The Age of The Satellite Molester.'

#237

Lionsgate, The FCC, The FBI, technology fans and copycat criminals are going to want to know all about you as you are a brand new type of criminal who commits anonymous assault, battery, privacy rights invasion and identity theft crimes using conventional TV Broadcasting and satellite transponder technology as your arsenal of weaponry.

You use this broadcasting technology in ways that I can't believe anyone else had ever before imagined. You use this technology cost-free to you (stockholders pay) and it needs to be STOPPED!

You, Lisa and other TV Guide Network 'players' play live cruel "Interactive Human Games" on unsuspecting victims, putting persons such as myself into a personal holocaust!

It sounds like something futuristic, from a 'Star Trek-like' TV show, a show that hasn't been written yet—but it's real and it's YOU! And due to the live satellite broadcasts that you say that TV Guide Network still currently pays for (that you are logged into) YOU'RE CAUGHT! And you need to surrender yourself, and surrender-up technical information to Lionsgate.

Michael, you and I have been joint together via an 'always-on 24/7 Live Broadcast Satellite transponder hook-up for almost 15 months now.' Both you and I have been through so much bad but by you confiding in Lionsgate, we can turn all of the bad into something GREAT, as Lionsgate can cap this and we can all work together to get safeguards into the business of broadcasting so that no one else will ever have to go through the 'illegal use of broadcast satellite transponder war' that you and other former TV Guide Network employees have firsthand seen me endure.

**Michael, here's a short summary of information that you very honestly revealed from July 14, 2013 through July 31, 2013 via "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" which in July 2013 you started calling "Michael Nalepa's Satellite Broadcast."**

Between July 14, 2013 through July 31 2013, you revealed that Lisa Germani secured your services in 2006, and what you keep unrevealed is how Lisa exactly revved you up and manipulated you into playing "Interactive Human Games" on me. You've revealed that your 'project' is a twofer project- "Make Michael Nalepa the boy in the parking lot" and "Make Lisa Germani, make Lynda Noiseux, or make any other girl, David Geffen's Secret Wife."

Along the way, throughout the satellite broadcast you have also hinted that Lisa had an embezzlement idea on how she was going to secure a large sum of money from TV Guide Network by saying that she was the victim of the night of terror that took place in October 2006. As you know, I was the victim of this criminal activity that involved the apartment above

# 238

mine; You've revealed that you and Lisa were the perpetrators and producers and you put me through sheer terror that lasted for hours that night, making me think that I was about to be murdered by gun-shot at any second, be it through the ceiling or through any of the windows of my apartment. This went on for hours. I was terrorized. I had to lay silently on the floor of my apartment without as much as the movement of a bone. If I would have called the police from a telephone I could have been shot and murdered; If I would have sneezed from the carpeting I could have been shot and murdered. The loud noises wouldn't stop! At one point my body went into shock. (I'll let you explain more as you and Rick Saloomey's team have revealed that TV Guide Network paid for this entire evening. Yourself, Rick and others all have the actual 'as broadcast' transcript of this evening.) Lisa Germani and others should have been immediately fired by Matt Singerman, Jack Carey, Paul Adler, Scott Woodward and Ryan O'Hara (Michael, you have the details). Instead, Matt, Ryan, Jack Carey, Paul Adler, Scott Woodward, Greg Hughes, and others helped to cover this up.

You have explained that it was you (in 2006) who through Victor Reyes of Doheny Drive Apartments secured a key and access to the apartment above mine. Also, some days prior to the October 2006 night of sheer terror, you produced a 'gay sex night' that took place in the apartment above mine that was 'very left-of-center' and was specifically produced by TV Guide Network employees (with possible enhancement of TV Guide Network's broadcast satellite transponder) to invade my solitude.

You've stated that since 2006, Lisa Germani and other co-workers have supplied you with extraordinary access to proprietary broadcast operations technology (including transponder access, access to geosynchronous broadcast satellites, closed-captioning machinery, and other tools reserved normally for the production and transmission of Live Event Red Carpet TV shows.) You may even currently have some broadcasting equipment at home that once belonged to TV Guide Network's broadcast operations unit or once belonged to the Tulsa broadcasting facility that were furnished to you. (Michael- you continue to have all of the answers!)

Michael, what exact equipment and technology you were supplied with, you can personally explain. But you continue to say that all technology that you've had and continue to have access to were and are paid for by TV Guide Network.

As I write this letter, the satellites (illegal live electronic monitoring and privacy rights invasion) of me remain in place. I continue to get electrocuted, tasered, electroshocked, hot spot burned and muscle bashed by the over-abundance of satellite technology that's assigned to my body.

**List of Hosts and Producers of the Always-On (24/7) Satellite Broadcast:**

#239



-Michael, you've been the host and producer of the live satellite broadcast from October 16, 2012 to the present (January 5, 2014). In fact, the satellite broadcast is on as I am writing this letter draft and we are communicating normally as we do 24/7 together.

-Michael, should Lionsgate invite you into a conference room where you can do a live 'show and tell,' for the company, I'd also like to be there at that meeting so I can see for myself the demonstration of technology/transponder use that I am a prisoner of; see for myself how that technology is controlled, manipulated, used by a host/producer.

-Rick Saloomey and his team including freelance producer David Park were the hosts/producers from December 26, 2010 through October 15, 2012. Rick also had some John and Jane Does, on his team (Persons whose identities' remain unknown to me helping out as broadcasters). A few times it was mentioned that Rick's wife Colleen Saloomey was a participating voice on the broadcast. I don't know if Rick was being paid or not by his former boss Kristan Giordano (Executive Producer, TV Guide Network Specials Department or by Kristan's boss, Paul Adler, Vice President of Originals) to host and produce and continue "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" but Rick a former employee and his team of former employees were given free access/log-in privileges to FCC-licensed broadcast satellite transponders and TV Guide Network FCC-licensed spectrum for just short of 22 months.

-Michael, you and members of TV Guide Network's Original Programming Division (run by V.P. Paul Adler and his Executive Producer Kristan Giordano) were also the hosts/producers from the last week of August 2010 through December 25, 2010. The employee-broadcasters (hosts/producers) during this phase included: yourself, Amy Sweet, Anne Alderete, Stephanie Schuler-Griffin, Laura Slobin, David Anderson, Ken McGilvray, Heather Case and others. Even Lynda Noiseux, my next-door neighbor here at Doheny Drive Apartments was broadcasting on TV Guide Network's satellite transponder hook-up. (You can explain all of this to Lionsgate).

**Why Satellite Monitoring On Me Still Exists:**

- 1) Michael, you continue to say that you believe that Kristan Giordano (Executive Producer of Specials, TV Guide Network) continues to pay for the 'live always-on, two-way real-time satellite broadcasts' out of her budget and that Kristan's budget also pays for the instant 'as-broadcast 'closed-captioning transcript emails that you receive at home (which you keep combined into a document that you, Rick Saloomey, Amy Sweet and others have called 'the Tricia Daniels encyclopedia.')
- 2) On Sunday, July 14, 2013 you revealed that "Lisa Germani" sent an email to Kristan Giordano in Fall 2012 where Lisa asked Kristan to continue to keep these satellites going

on Tricia Daniels until Lisa returned to the office, as an employee of TV Guide Network, back on payroll.

3) You next revealed that it was YOU masquerading as Lisa Germani on this email that Kristan received where YOU posing as Lisa was the one who asked Kristan to keep these satellites going on me! (You were using Lisa's non-shutdown email address).

3a) You also added that Kristan to this day has no knowledge that it was YOU masquerading as Lisa on this email she received.

4) You added that Lisa (who presently lives in Kirkland, Washington, newly married to Mr. Brad Williams of Brady Corp.--- stock symbol: NYSE: BRC ) may or may not have (but probably doesn't have) any idea that her "Privacy Rights Invasion Satellite Media Tour" is still going on.

5) Michael, please let it be known that you were not an employee in fall 2012 when you sent this email to Kristan where you masqueraded as Lisa Germani using Lisa's email, nor was Lisa. As we both know, Lisa was let-go in August 2011, just 3 months after I was let-go and this means that current employee Kristan Giordano, if she's guilty, has some explaining to do about allowing current and former employees for years to have free 24/7 access to multiple broadcast satellites and FCC-licensed transponders and spectrum for criminal and unlawful purposes.

6) Michael- Kristan Giordano is completely innocent in my book unless further information, or proof from you or from Rick Saloomey, or from Encompass, or past invoices from TV Guide Network's accounting department prove her guilty—But if what you say is true and if it is found that Kristan Giordano is allowing her budget to pay for satellite crimes then here are a few questions that I have:

6a) If guilty, to this day why does Kristan Giordano personally allow her budget to continue to pay for criminal Privacy Rights invasion activity to take place on me? What's to be gained? She could have said "no!" (Note: As an Executive Producer its Kristan's job to say NO to a request of this type!)

6b) If guilty, why didn't Kristan monitor what non-employee Lisa Germani (secretly YOU playing Lisa) was doing with this broadcast technology? If guilty, this means that Kristan, as an

#241

Executive Producer violated Lionsgate company policy (and perhaps even FCC policy) by allowing anyone (employees or non-employees) access to commercial broadcast satellites/transponders/spectrum for personal and criminal use.

6c) If guilty, Kristan's misconduct as an Executive Producer allowed me to be repeatedly hurt at high-wattage and voltage levels, which still takes place daily. I have also had to endure the terror of going through these violent crimes.

6d) If guilty, due to Kristan's misconduct, I had to seek medical attention both on my own and through Lionsgate's Worker's Compensation administrator. And my quality of life has been affected. (I am hoping that once the satellites get removed from my person that the "satellite umbrella" that effects my eyes will go away and that my eyes will return to as close to normalcy as possible.)

6e) Here is a list of some Doctors Appointments I have had as I try to find some sort of cure for the 'state of lighting sensitivity' that affects my eyesight due to broadcast satellites (illegal electronic monitoring via technology) that I am a prisoner of.

Note- the Worker's Compensation Doctors' Appointments that I had are not listed here. Those appointments were paid for by Lionsgate (via The Hartford Insurance Company). The appointments listed below are just the eye doctor appointments that I paid for, on my own. As you are aware, all of the Eye Doctors that I visited have no cure or temporary cure for the lighting sensitivity that has resulted from the criminal misuse of satellite technology on my body.

11/7/12	Eye Exam	Jules Stein Institute
11/7/12	Eye Testing Appt.	Jules Stein Institute
9/9/12	Eye Office Visit	Jules Stein Institute
8/17/12	Eye Exam	to the NYC based eye Doctor my family uses
4/28/10	Eye Exam	Beverly Hills based eye Doctor

6f) Michael, as you know I have also personally paid for and tried endless shades of sunglasses and other things (Transitions eye glasses, TheraSpecs Fluorescent Goggles; I even took a monthly mail-order subscription to Orlin Sorensen Eye Vitamins- a mix of 17 vitamins, minerals and herbal supplements that medical research has shown to support vision and eye health, etc.)

# 242

- 7) Michael, through your broadcasts and through the broadcasts of other former co-workers (from Kristan Giordano and Paul Adler's division formerly Matt Singerman's division, what has emerged is an ugly story about the extra-curricular activities of TV Guide Network employees who for years (from 2003 or 2004 to the present) have used and continue to use satellite technology improperly as their own to commit 'Bling Ring-like' and even more severe criminal activities. What's also emerged is an ugly story about how TV Guide Network senior management through the years (including names: Danila DaRodda-Koverman, Ryan O'Hara, Matthew Singerman, Scott Woodward, Paul Adler, Jack Carey, Greg Hughes, Kristan Giordano, Tina Charles) violated and continue to violate Federal, State and International Laws by allowing employee misuse of broadcast satellites to continue. Upon this writing, Employee and former employee misuse of company property (FCC licensed broadcast satellites and transponder use, Earth Station use, frequency/spectrum use) for criminal activity continues to take place.
- 8) Michael, your admitted improper use of Lisa Germani's email (where you asked Kristan to continue satellites on me) wasn't a one-time only thing. On Sunday, July 14, 2013 you also newly admitted that you have a frequent personal history during and after your employment of using Lisa Germani's TV Guide email account where you have posed/masqueraded, sending emails as Lisa to various persons, both inside and outside the company for different purposes. (You've admitted that you've used Lisa's email to send regular correspondence to some of my neighbors who live in my apartment building as well as to Victor Reyes, who is one of the management executives of Doheny Drive Apartments)—all for your 'David Geffen Project.'
- 9) And on July 14, 2013, you newly revealed/admitted that some of the emails that YOU sent, where YOU masqueraded/posed as Lisa Germani using Lisa Germani's TV Guide email account were to Nancy Coleman (EVP of Human Resources, Lionsgate) to get me fired, thrown out of the office, separated from the company via lay-off, to try to get me put on some sort of false leave or false disability.
- 9a) On July 14, 2013 you newly admitted that when you sent these emails to Nancy where you masqueraded as Lisa, your aim was to do whatever you could do to get me taken off the payroll, fired, so that YOU could get put back on payroll by Lisa Germani in my place.
- 9b) Michael, when you were let-go in January 2011, you signed a separation agreement and received severance from Lionsgate, but the allure of free unrestricted access to



broadcast satellites and the 'bling-ring'/criminal activities that the use of multi-satellites allowed you was a prime benefit of doing whatever you could do to get yourself "back in" and it made no difference if it undermined and hurt others like me. (Question- hadn't you already hurt me enough?)

9c) Michael, one of the terms of the separation agreement that you agreed to was to return all company property. Your personal, at-home use of Lisa Germani's TV Guide company email after your employment ended is a direct violation of your Separation Agreement, and it's also trouble for Lisa. The trouble for Lisa is that she was still a Lionsgate employee in 2011 and she violated company policy that is spelled-out in the Lionsgate Employee Handbook. Lisa was never supposed to allow any non-employee to have access to her email or to company technology (which you've stated Lisa knew that you were still using after you became separated from the company.) You've admitted that you continued to use Lisa's email until it was shut down which finally happened in November or December 2012. (Lisa's regular employment ended in August 2011.)

9d) Throughout Lisa's career at TV Guide Network, it wasn't the first time that Lisa violated company policy. She should have been fired back in 2004, 2005, 2006 for various different reasons.

**VERY IMPORTANTLY:**

10) On Sunday, July 14<sup>th</sup>, you revealed, admitted and confirmed to me that my own employment with TV Guide Network/Lionsgate was indeed "wrongfully terminated" in May 2011 by YOU masquerading as Lisa Germani on email to others (including to Paul Adler and Nancy Coleman) at TV Guide and Lionsgate. I'll leave the further facts to you to explain to Richard Prell and to others at Lionsgate.... But on Sunday, July 14, 2013 you revealed to me that you wanted to get yourself back into the office so that you could get yourself back onto unrestricted broadcast satellite access and also back onto payroll and health insurance.

10a) In your satellite broadcasts since July 14<sup>th</sup>, you've admitted/revealed that you have your own 'Michael Nalepa Productions project,' (your "David Geffen Project") that depends on broadcast satellites and other assets that TV Guide Network can pay for. And that your "David Geffen Project" which you've worked on since 2006 with Lisa Germani can't be completed unless you have access to TV Guide Network's technology/satellite assets.

# 244

10b) And that TV Guide Network has been paying for pieces of the Lisa Germani Productions/Michael Nalepa Productions joint "David Geffen Project" since 2006.

11) On Sunday, July 14, 2013, you also revealed to me that it was YOU (Michael Nalepa) on email, masquerading from home as Lisa Germani (where you used Lisa Germani's email account) who in Jan 2011 and Feb 2011 wrote emails to Nancy Coleman (Lionsgate Human Resources) where YOU told Nancy:

11a) the company wants Tricia Daniels to go on psychotropic drugs.

11b) You newly revealed that YOU also sent Nancy an email (yourself newly terminated, in 2011, masquerading from home as Lisa Germani, using Lisa Germani's email) where you point-blank stated 'Nancy, your job is to get rid of Tricia Daniels and to get back Michael Nalepa.' And the email was signed Lisa Germani.

11c) When you sent these emails in 2011, Lisa was still an employee, I was still an employee....but your own employment had been terminated and you were trying to get yourself 'back in.' You had big plans for your future satellite transponder usage—Your "David Geffen Project" and other future projects.

11d) Michael, you have also newly revealed that in October 2010, while you were still an employee, you sent emails using Lisa Germani's email account, (where YOU masqueraded as Lisa Germani) to Nancy Coleman (Lionsgate's EVP of Human Resources) where you tried to end my employment. This is when Nancy threw me out of the office and put me on telecommuting which by December 1<sup>st</sup> turned into some strange sort of "leave of duty" that only you, Lisa Germani and Nancy Coleman can explain.

12) Michael, you also have not yet revealed all details about: TV Guide Network's use of the apartment above mine at 1015 N. Doheny Drive, West Hollywood, CA 90069. It explains some strange events that have transpired in that apartment above mine, at various times through recent years (2006 through 2010).

12a) Michael, you've admitted that you do have the personal details on how you and Lisa Germani manipulated the use of the apartment above mine in 2006 and in 2010 to cause sheer terror to me.

12b) You also have said that you have unrevealed details about how my upstairs neighbor received personal emails from Lisa Germani (Yep- YOU masquerading as Lisa)

#245

that you say my neighbor stopped receiving at the end of 2012 when Lionsgate finally turned off Lisa Germani's dormant email account.

12c) You also have briefly touched upon how Lisa Germani recruited you in 2006 for brain scanning/privacy rights invasion/identity theft/identity transfer purposes. And what's unrevealed is how you came up with your "David Geffen Project." Was it from Lisa Germani's and your own 'brain scanning' of me?

12d) Michael, you say that you wanted to be "the boy in the parking lot." Yet- I have never had any conversation with you, Lisa or anyone about 'the parking lot' (other than a brief remark made to Steve Rubell in 1989 in VH-1's NYC studio when Steve started the conversation about my famous neighbor, David Geffen, with me. Steve and David were personal friends.) Michael, whatever information you and Lisa have gleaned regarding "the parking lot" and my former neighbor David Geffen, you have gleaned directly from "Lisa Germani's and Michael Nalepa's Privacy Rights Invasion Satellite Media Tour"—not from me.

12e) Former co-worker Anne Alderete also gleaned information from Privacy Rights Invasion transcripts, hence her 'December 24, 2010- Christmas Eve Massacre' night of terror she put me through where she repeatedly said 'We just killed David Geffen and we're here to kill you' and "No more dirty stinking f---king Jews at TV Guide Network." (David Park from Rick Saloomey's team probably has the transcript of Anne's 'Interactive Human Game'- David was on the satellite media tour as a producer that night. He was probably as surprised by Anne's broadcast as I was and David Park can probably discuss what he heard Anne repeatedly say, what happened this night and why no one was able to cut Anne Alderete's broadcast. She went on for a few hours and at one point she was talking about gun-shots.)

12f) You have also newly revealed that after the October 2006 'night of sheer terror' didn't work out the way that you and Lisa wanted (with me getting an instant heart attack and passing away from natural causes) or with me moving permanently to a new apartment building running in fear for my life, that Lisa Germani employed you as the new Talent Department Assistant at TV Guide Network where you and Lisa daily could work together on your joint extracurricular 'David Geffen Project' and perhaps other bling ring satellite crimes. ...and this was during the Rupert Murdoch Gemstar/TV Guide era!

#246

12g) You also have revealed that Lisa was brain scanning my terror as you were putting me through it during that October 2006 night; and that Lisa was giving you instructions throughout the evening. (Including rapist at the door, etc.)

13) Michael, you still have some un-revealed details about TV Guide Network's interaction with Victor Reyes, of Doheny Drive Apartments. Victor as of this writing continues to work for Doheny Drive Apartments owner Sunny Sassoon, both here and in Sunny's other business. Sunny's other business is: The Coffee Bean & Tea Leaf. (Sunny is The Executive Chairman of The Management Board of The Coffee Bean & Tea Leaf.)

13a) Interaction includes doing what you could to try to get me to evicted from my apartment so that you or Lisa Germani or someone else (even next-door neighbor Lynda Noiseux) could move into my apartment (where I've lived since 1986) instead of me. In your view, if you could secure my apartment for yourself then this would've made you 'the boy in the parking lot, for your 'David Geffen Project.'

13b) You also have admitted that you're sorry to me about what has taken place. Michael, Thank you again for all of your honesty.

13c) Michael, there were plumbing bills falsely created by your interference with management of Doheny Drive Apartments (bills which I paid in order to keep my tenancy) for a running toilet and for water that my toilet didn't use. When I did the math, the bills (from Tracy Taylor, Property Manager for Coffee Bean & Tea Leaf and also for Doheny Drive Apartments) said that my toilet gobbled down 100 gallons of water per hour! (It was impossible and false)—yet I had to pay these bills that amounted to about \$5,000 or face eviction. I also had lawyer costs and you put me through so much needless emotional distress. There were other interferences/interactions between yourself and Victor Reyes of Doheny Drive Apartments that you can detail.

13d) Michael- you also have some un-revealed details about your own interaction with neighbors who reside in my apartment building. Case-in-Point: Lynda Noiseux. Lynda moved out of Doheny Drive Apartments in 2010 but here is a brief chart of nights that I had to run away from home and stay in a hotel because of terror that Lynda put me through here at Doheny Drive Apartments. You have newly revealed that TV Guide Network employees were giving Lynda script and instructions on what to do and say.

8/16/10

Motel 6

\$68.39

#247



8/17/10	Motel 6	\$68.39
9/28/10	Hotel booked thru Expedia.com	\$69.27
10/2/10	Best Western Hotel	\$96.32
10/3/10	Best Western Hotel	\$96.32
10/15/10	Calimesa Hotel	\$66.00
10/16/10	Calimesa Hotel	\$66.00
10/31/10	Knights Inn	\$64.20
11/7/10	Hotel booked thru Expedia.com	\$49.13
11/8/10	Hotel booked thru Expedia.com	\$57.67
11/9/10	Hotel booked thru Expedia.com	\$63.72

And there were 4 other nights not included here that I had to flee my apartment and stay away due to neighbor Lynda Noiseux who TV Guide Network co-workers were directing in Interactive Human Games against me.

---

14) Lynda's scripts (which I didn't know in 2010 were scripts at the time) while I was navigating through 'interactive human games' terrorized me. Lynda's scripts were designed by TV Guide Network co-workers to keep me in terror. And they caused real terror. Lynda's participation included:

-Lynda talking live to someone playing Richard Sherman.

-Lynda even recited a list of how many millions of dollars TV Guide Staffers were going to receive when Lisa Germani became 'David Geffen's Secret Wife.' (Anne Alderete- \$5 Million Dollars, Kristan Giordano-\$ 4 Million Dollars, Paul Adler- \$7 Million Dollars, Matt Singerman- \$3 Million Dollars, etc. etc. etc.)

-Lynda also said a few times that she wanted "Marc" to break into my bedroom window and rape me in my sleep and then murder me. Lynda also had additional comments that I wrote in my Richard Prell letter of May 2013.

14a) It was part of the plan that you and others designed to keep me "in terror" ....keep me terrorized. The 'as broadcast' closed-captioning transcripts will show that at one point I was referred to as "Laura Nyro" by co-workers, It was a night when I was being sexually assaulted (by TV Guide Network's leased/sub-leased transponders) while I was satellite-transponder kidnapped and my co-workers said that "Laura Nyro will be dead by October 21, 2010."—but, my co-workers were referring to me, that I was going to be

#248

dead by October 21, 2010. (Other remarks included that Sandy Gallin had a bet on my death, etc.)

14b) Michael- you can discuss how I was kidnapped by voices that I didn't recognize for about 6 weeks. Things got so scary that the first weekend of October 2010, I had to just run away from my cyber kidnappers so I used 80,000 Frequent Flier miles and flew to NYC on a red-eye for just the weekend. My cyber kidnappers (who a few weeks later turned out to be my TV Guide Network co-workers from Paul Adler and Kristan Giordano's division) did indeed keep me in a constant state of terror and even repeatedly sexually tasered/assaulted my genitals (via TV Guide Network's satellite transponders) while I was at both my parents Queens, NY apartment and at one of my brother's residences where he has 3 young children. Also- when one of my brothers picked me up at the airport ... I'll leave this to you Michael to explain as you probably have an audio tape of this disgusting sexual harassment "Interactive Human Game" that was broadcast live to my brother's car via TV Guide Network's satellite transponders.

15) Here's more that you can discuss-- why and how (via technology) I was sexually assaulted and tasered in my female body parts (in Sept, Oct and Nov 2010).....How my own body parts were made fun of via broadcast satellite.....Which staff were broadcasting to me.....How you were the one who revved up Laurie Muslow with 'Last Will and Testament' questions to be played on me. You have admitted that you told Laurie that she was in a \$3 Million Dollar Game that escalated suddenly up to \$30 Million Dollars.....you also have details about the naked/toweled woman who was bothering me in the locker room of the Northridge 24 Hour Fitness on Saturday, August 14, 2011. (you have revealed that you had something to do with arranging this.)

15a) and Michael, you can detail how you used and kept increasing satellite wattage on me at work. I actually got burned by the lighting at work (TV Guide Network's Hollywood offices) and it became intolerable to sit under the workplace lighting, intolerable to ride in the workplace elevators, even intolerable due to lighting to park in my office parking space due to the sudden handicap that my eyes and body developed from the increased levels of satellite wattage that you were using on me that formed some sort of satellite umbrella over my body. (This was all for your 'David Geffen Project.').

15b) Michael- you also have admitted that it was you who called the Beverly Hills Police on me and started a police record on me when I went to David Geffen's house one night in August 2010. That night 3 police cars (6 armed officers) showed up to David Geffen's

# 249

house for me! Michael, you can fill in Lionsgate on these details, on how you knew from the satellite broadcast that I was on my way to David Geffen's house, etc.

15c) Let it be known that David Geffen and I know each other since 1963 (we first met when he was 20 years old and I was three years old).

**16) Did David Geffen participate in a TV Guide Network Project on August 18, 2010?**

Michael -you have only divulged small bits of information to me about "Richard Sherman Day at Doheny Drive Apartments." (Richard Sherman is a longtime, real-life employee of David Geffen). It was the day after my father's 85<sup>th</sup> Birthday and at 8:10am when I woke up, preparing to go to the TV Guide offices to start a new day of work, things "started" in the apartment upstairs from me...and that evening a "live David Geffen event" took place in the parking lot out back.

16a) Info re: "The Live David Geffen Event"--Michael Nalepa states that TV Guide Network paid for the live event that took place in the parking lot/backyard area of my apartment building (on August 18, 2010) where there was a David Geffen presence via a small television monitor. Questions-Was it a live satellite feed that starred David Geffen? Was it pre-recorded? Was it faked to be live? Was an actor playing David Geffen?

16b) The theme of this "live David Geffen event" on August 18, 2010 centered on an astronaut.

\*There was an actual astronaut outfit set-up and strung up on wires which was obviously rented or constructed by movie prop-masters.

\*The astronaut costume itself was some sort of motion picture-like Astronaut-Shooting-Costume, a movie-type of costume facade with a live male stuntman. (Yes, there was a live male stuntman on a large, tall, platform that was set-up in the parking lot behind my apartment building.)

\*The stuntman was able to easily enter and exit the Astronaut costume facade on cue; he'd shoot a segment then go off to the side into a black curtained room during the breaks from shooting.

\*Professional movie-making gear was also on hand---a water tank, the long rigged-up stage/platform (mentioned above) that looked like it was professionally trucked in. There was a female director's voice. Everything was so professional that it looked like a DreamWorks SKG or Lionsgate movie production yet Michael Nalepa says that TV Guide Network produced and paid for it all.

# 250

17) During Fall 2010—on the ‘always on’ 24/7, satellite broadcasts why would TV Guide Network co-workers (from Paul Adler and Kristan Giordano’s production departments) repeatedly broadcast that (my boss) Scott Woodward (Executive Vice President of Programming and Production) told staffers that he personally wants me raped all weekend? (Rape done via assault using TV Guide Network’s leased/subleased satellite transponders to brutally sexually assault my body?)

17a) Why in October 2010 did Amy Sweet say on the satellite broadcast (when she was a host/producer that night along with David Anderson and Laura Slobin) that Allen Shapiro wanted me raped and that Allen Shapiro personally ordered my rape to be put into the script? (Question- what script?) Amy first revealed this night that there were transcripts of all broadcasts and of all interactive human games that co-workers were playing on me. Amy was the staff writer for TV Guide Network at this time....what script was she writing? Or was she just chit-chatting and filling time during her broadcasting shift on the employee self-interest satellite broadcast?

17b) During Fall 2010—on the same era of satellite broadcasts, Allen Shapiro was a sometimes broadcaster. (Now in 2014, we know that it was a staff member in 2010 who was playing/impersonating the voice of Allen Shapiro via broadcast satellite). Personally, I am not familiar with Allen Shapiro’s voice. I have heard it briefly only a few times in my lifetime so in 2010, I had no way of knowing that it wasn’t Allen Shapiro who was speaking to me and that it was a TV Guide Network employee or ‘John/Jane Doe’ broadcaster who was recruited to play Allen Shapiro on the employee self-interest broadcasts of 2010.

(Note: I have only heard Allen Shapiro’s voice in May 1969 when I was 8 years old, I have only heard Allen Shapiro’s voice in July 1986 when I worked for ABC-TV’s “Good Morning America” and Allen and I had a few telephone conversations re: a GMA booking of Jenny Jones (in her “Star Search” era, pre-Talk Show Host era)...and I heard Allen Shapiro’s voice once in April 2010, when he made some introductory remarks about TV Guide Network’s new upfronts presentation that the Ad Sales Department was about to roll for all of us to see.)

17c) Why would someone play the voice of Clive Davis during Fall 2010 on the satellite broadcasts? (The pitch and tone was not Clive’s voice at all). Once, even an Irving Azoff voice

#251



made an appearance (Note: I have never met Irving Azoff so I only know his voice from interviews I have seen him do.) Then TV Guide staffers made up that David Geffen, Clive Davis, Irving Azoff and Allen Shapiro all had money bets down and that David Geffen fronted Allen Shapiro with \$30 Million Dollars so that Allen could participate. (Michael, the transcripts in your possession from these live "Interactive Human Games" played on me as well as your own recall, knows what happened.)

18) Former co-worker Amy Sweet had a few interesting things to say at various times via the satellite broadcasts. One Friday night during October 2010, she said that David Geffen gave/lent Allen Shapiro some money to buy TV Guide Network. At another time, (on Saturday, October 30<sup>th</sup>, 2010) she said that there were a few things that Lionsgate wanted me to know—including the fact that Michael Nalepa robbed my apartment (yep- Michael, thanks to your honesty, you revealed on July 14, 2013 that you robbed my apartment—but we both know that you didn't take much, you only took a couple of items that you needed for your 'David Geffen Project.')

Question- how did you get a key to my apartment? Did Victor Reyes of Doheny Drive Apartments (or someone else?) provide a pass key to you?

18a) Speaking of robbery--- you went into my EBAY account and purchased a \$1600 camera and paid for it by electronically switching money from my bank account to the EBAY camera vendor. (You had my passwords and every password and piece of confidential information about me due to "Lisa Germani's Privacy Rights Invasion Satellite Media Tour")

19) Michael, on Sunday, July 14<sup>th</sup>, you newly honestly revealed that it was YOU who brutally assaulted me on Monday, August 16, 2010 using TV Guide Network's leased/subleased broadcast satellite transponders. It was rape with a foreign object! It was intentional assault with my inability to leave.

19a) Early that morning, (from 1:39am to 5:45am) you continuously and brutally "gang-raped" me nonstop using TV Guide Network's FCC licensed leased/subleased satellite transponders as satellite weaponry.

19b) Michael, you had no regard for the level of terror or pain that you put me through. This lasted from 1:39am to approx. 5:45am and I lost almost all of the water in my body and I was brutalized by YOU, using technology that is only supposed to be used by TV Guide Network to

# 252

broadcast TV shows with. And you were brain-scanning me, recording every thought in my head as you were brutally and criminally raping me. I'll openly admit that for a person of my age, I probably have the least sexual history of anyone---and you knew this from information that you gleaned from ""Lisa Germani's Privacy Rights Invasion Satellite Media Tour." And you barbarically raped me. Question- why didn't TV Guide Management fire you and file charges against you? (Answer- Probably because this would have exposed and ruined the "Bling-Ring" activities that TV Guide Network employees from Paul Adler and Kristan Giordano's departments wanted to keep secret and have continued access to. (Michael-I'll just leave the rest to you to explain.) And you can also explain 'how much' or 'how little' Jack Carey (TV Guide Network Operations) and his Department had to do with all that took place due to misuse of company assets...specifically employee illegal usage of broadcast satellite transponder technology for personal gain.

19c) Michael, you didn't start this, you just out-produced all other TV Guide Network employees and I'd like to take this opportunity to put in a few more good words for you here. Out of the all of the TV Guide Network current and former employees involved in this 'company game' on me, you Michael are the ONLY one who I'd like to see offered the chance to be the informant to Lionsgate. Lionsgate will learn the most from you. Michael, there is so much good and honesty in you. Your dedication to the truth, your unpaid time personally spent with me 24/7 on the employee self-interest broadcast, your host/producer talents, not to mention technical knowledge make you the ideal informant. (Note- I myself want to learn more about all of the ways technology was manipulated by former TV Guide Network co-workers to hurt me).

20) Michael, on July 14, 2013, you newly admitted that you do have some knowledge on how TV Guide Network's satellite transponders interacted with former TV Guide Network producer Julia Rolle. Julia died on July 4, 2010. Michael, you have repeatedly admitted that Julia (like me) was brain-scanned by "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" and that Julia's life was also interfered with by TV Guide Network employees. You've admitted that Julia Rolle was 'brain scanned' for 3 years (you've said that Julia had two satellites assigned to her body which monitored her 24/7).

In closing, Michael, until all of the above information started being revealed to me by yourself, and also by Rick Saloomey with his team, (dates: 12/26/10 through 10/15/12), I had no knowledge that my TV Guide Network co-workers secretly conspired and produced various "Interactive Human Games" designed to harm me and cause sheer terror and heart-attack

# 253

inducing levels of emotional distress and unfair levels of sexual assault (and the terror that comes with brutal sexual assault while it's happening to you).

Michael- you can explain to Lionsgate how on October 16, 2012, you gained full control of "Lisa Germani's Satellite Media Tour" when Kristan Giordano hired Rick Saloomey as a freelance producer to accompany her (and Miguel Romo) on a work trip to Brazil where the three would be shooting a forthcoming TV Special that would be broadcast on TV Guide Network.

Michael—you can also explain how much money you think this whole thing has cost Lionsgate as its 5-year ownership anniversary of TV Guide Network quickly approaches. A few weeks ago, (specifically on December 12<sup>th</sup>, 2013) you and I had an interesting conversation via the satellite media tour where you revealed that Lisa Germani once told you that the 'always on, 24/7' satellite hook-up/brain scanning of Tricia Daniels costs \$3,000 a day. During that same 12/12/13 conversation it was said that due to multiple transponder set-ups that it may have cost up to \$6,000 a day during the last 5 years (which amounts to about \$11 Million Dollars of cost if you add up the five year period of January 2009 to January 2014) for employee misuse of Lionsgate company assets! (Assets are: Transponders/satellites, live closed-captioning machinery, broadcast operations transmission costs, added electricity to power TV Guide Network's Tulsa based earth station, namely all the costs associated with powering "Lisa Germani's Privacy Rights Invasion Satellite Media Tour.")

From 2010, to the present, other names for the employee self-interest broadcast have been  
\*Michael Nalepa's Satellite Broadcast (July 2013 to the present)

\* Paul Adler, Kristan Giordano and Jack Carey's Big Cover-Up (a current title)

\* Nancy Coleman's Big Mess (a current title)

\*Lisa Germani's Privacy Rights Invasion Satellite Media Tour (a current title and the longest, most frequently used overall title of the employee self-interest broadcast.)

Michael, you continue to have all of the answers. I look forward to learning more from you and from Lionsgate.

Action: Michael, I hope that you and Lionsgate can quickly connect this week where Lionsgate will give you the opportunity to tell your story, including but not limited to how Lisa Germani found you..... how Lisa taught you to brain scan and commit Privacy Rights Invasion and interference crimes using broadcast technology....what return Lisa promised you...where Lisa learned to brain scan...what return (if any) did Fernita Wynn promise to Tina Charles. (Per Rick Saloomey, it was Tina Charles who taught Rick Saloomey how to brain scan and it was Fernita Wynn who taught Tina).... Michael, Why you embarked on a path to make yourself, what you

#254

call 'the boy in the parking lot'.....what made Lisa Germani think that 'David Geffen had a secret wife and that it could be Lisa'...what Lynda Noiseux and other neighbors at Doheny Drive Apartments (where I still reside) were promised...what Victor Reyes of Doheny Drive Apartments was exactly promised.....and more.

Signed,

Tricia Daniels

1015 N. Doheny Drive, Apt #1

West Hollywood, CA 90069

Cell: 310-614-3408

#255



**Notes to David Mandell, to the JAMS Arbitrators and To My Lionsgate Family:**

- a) Below is the text of Letter #1 that I mailed to Lionsgate's Compliance Officer Richard Prell in May 2013.
- b) Since sending this first letter to Richard Prell, I was able to locate FCC Licenses for satellite vendor Encompass Digital Media and Bill Tillson who you will see mentioned within. For some reason Bill Tillson's FCC licenses are registered to the name BFI Licenses, LLC. Interestingly, BFI Licenses, LLC has over 200 FCC licenses registered.
- c) Many times between early 2011 through early May 2013, my co-workers stated on their broadcast to me that satellite vendor Encompass (formerly Ascent Media) gets paid by Lionsgate/TV Guide Network to run "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." Vendor Bill Tillson purchased Ascent Media in February 2011, Soon after, Bill Tillson changed the name of the company from Ascent Media to Encompass Digital Media.
- d) Since sending this letter to Richard Prell, Michael Nalepa newly started stating on the satellite broadcast that this thing runs on TV Guide Network's main satellite transponder which satellite vendor Intelsat owns. (Intelsat is a public company that trades under the symbol NYSE: I)

Signed: Tricia Daniels

Date: August 3, 2015

Date: May 7, 2013

Mr. Richard Prell  
Compliance Officer  
Lions Gate Entertainment Corp.  
2700 Colorado Avenue  
Santa Monica, CA 90404

Dear Mr. Richard Prell:

Per Lions Gate Entertainment Corp's Code of Business Conduct and Ethics ("the Code") for Directors, Officers and Employees, I am writing directly to you. I am a former employee of TV Guide Network which makes me a "covered person."

I am a victim of outrageous behavior and law-breaking criminal misconduct which I experienced firsthand (both DURING and AFTER) my employment at TV Guide Network. Outrageous criminal behavior which allegedly started during Rupert Murdoch's control of Gemstar/TV Guide Network; Criminal behavior that has allegedly remained in place through all subsequent ownerships; criminal

# 256

behavior that currently remains in place today (during Lions Gate/CBS Corp's 50-50 co-ownership) as I write this letter to you.

Enclosed Attachments:

- 1) See: Copy of Letter to Allen Shapiro and Jack Carey dated Monday, May 6, 2013
- 2) See: Copy of Letter to Allen Shapiro and Jack Carey dated Friday, February 8, 2013
- 3) See: Copy of Letter to Eileen Kohler and Brett Pugliese dated Tuesday, November 27, 2012 (my statement and witness list to be filed in my company Worker's Compensation folder.)

---

Violations of Lions Gate's "The Code" and Company Policies are:

- 1) Employee pre-meditated misuse of company services and assets for unlawful and improper purposes.
- 2) TV Guide Network Management and Lions Gate's Human Resources Department has condoned these infractions and have kept them unreported to you and uncorrected.

Company Officers (i.e.-Allen Shapiro, Jack Carey, Nancy Coleman, Eileen Kohler, Brett Pugliese and others) have a corporate responsibility to protect employees, to protect company assets, to work with company vendors in solving bad problems and if criminal situations at hand are not able to be resolved then said Company Officers have a responsibility to Lions Gate to alert you to law-breaking infractions and alleged criminal misconduct per "The Code" and per confidentiality agreements all employees signed at the start of our Lions Gate employment to ask for your help in fixing infractions. (I believe that I signed my Confidentiality Agreement on Friday, February 6, 2009 which should still remain in Lions Gate's legal files. Additionally I signed a Confidentiality Agreement with Gemstar/TV Guide under Rupert Murdoch's News Corp management of the company back on August 9, 2004.)

---

I am not writing anonymously. You can absolutely use my name. It seems that nothing about me is anonymous to current and former TV Guide Network employees. Allegedly, I am THE WORST VICTIM EVER of what internally is called "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" and the criminal activity doesn't stop there. I am also the victim of pre-meditated co-worker assault and the victim of a terror and 'gang harassment' crime spree that was organized exclusively by co-workers to hurt me. (See more info re: dates and witnesses later in this letter.)

I am looking for Lions Gate to investigate and to permanently remove/disconnect my person from all satellite broadcast technology. I am also looking to receive a copy of what former TV Guide Network co-workers currently call "The Tricia Daniels Encyclopedia" (allegedly, a 3,000-plus page digital file of all of the daily transcripts of Privacy Rights Invasion that former employees have copies of. I understand that the most complete and updated copy resides in the hands of former co-worker Michael Nalepa.)

#257

I am also looking to obtain an emergency contact number, that I can keep at all times with me, for someone at Lions Gate (perhaps yourself?) who I can immediately telephone should I ever again get repeatedly burnt, electrocuted, assaulted, all-out attacked (with inability to leave) by TV Guide Network's current and former employees and vendors using company and/or leased broadcast operations machinery!

I am certain that upon your investigation, details of "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" are going to unnerve you. The misconduct that you will uncover does not conform to Lions Gate's policies; does not conform to Federal, State and International laws; does not conform to business licenses and regulations. Does not conform to FCC broadcast licensee responsibilities and is as disturbing, perhaps even more disturbing than the U.K. phone-hacking scandal that Rupert Murdoch and News Corp took extraordinary appropriate corporate due-diligence and clean-up procedures on. (Strangely, it would seem that upon Lions Gate's investigation, you and fellow investigators are going to uncover that I am going to emerge as perhaps the worst victim ever of Privacy Rights Invasion.)

Some former co-workers have created a sub-name for the criminal activity that I am a victim of. They use the moniker "Brain-Scanning." Personally, from what I have experienced, I can tell you and fellow Lions Gate investigators that brain scanning as an investigative, medical and communications tool has unlimited potential. However, "Brain-Scanning" (or call it Brain-Hacking) coupled with TV Guide Network's broadcast technology (used as assault weaponry) has no employee, no member of the public, no citizen of the world or celebrity safe from this ultimate intrusion that is powered by technology and is currently paid for by Lions Gate/CBS Corp's TV Guide Network (Programming, Production and Broadcast Operations budget.)

---

"Who" to interview as my 3 best witnesses:

- 1) **Witness #1:** Michael Nalepa (former Talent Department Assistant to Lisa Germani). No person has more moral and ethical and informational character and a sense of corporate responsibility than Michael Nalepa. If Lions Gate investigators were to hire Michael as a Special Technical Consultant and informant to your "Tricia Daniels Investigation," Michael would be able to provide the ultimate firsthand details of the history of criminal activities at TV Guide Network. Michael would also be able to outline and demonstrate as a 'show and tell' the exact technical architecture of Lisa Germani's Satellite Media Tour, and Michael would be able to discuss each way that I have been assaulted (burnt, molested, electrocuted, raped, muscle bashed) by TV Guide Network's broadcast machinery and leased/contracted/vendor supplied satellites.

\*Allegedly TV Guide Network's current satellite provider/vendor is not FCC licensed as an individual or as a business. His name is Bill Tillson and he is the CEO of Encompass Digital Media. Allegedly, according to Michael Nalepa, "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" originates via Encompass Digital Media. Michael Nalepa also states that prior to Encompass, Lisa Germani's satellite media tour, originated from a company called Ascent Media.

# 258

\*I read on the internet that Encompass Digital Media completed its purchase of Ascent Media's Broadcasting/Network Origination arm in February 2011 and it is my feeling that vendor Bill Tillson perhaps is an innocent party in this; Perhaps, upon Bill's/Encompass's purchase of Ascent Media, Bill simply inherited whatever business licenses and accounts that Ascent Media had, including Lions Gate's contract to broadcast/fulfill Network Origination transmission for TV Guide Network (which "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" allegedly is a part of.) Perhaps Bill doesn't know that he and his business probably need to be FCC licensed at this point in his career. (Michael Nalepa and my 2 additional witnesses named below can tell you more.)

\*It is troubling to me and should be troubling to Lions Gate not to mention the broadcasting industry at large that Bill Tillson and his firm Encompass Digital Media, remain unlicensed by the FCC and that Bill and his staff have no exact idea that Federal, State, and International Laws are allegedly being violated by his firm due to the broadcast of "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" which allegedly Bill's firm Encompass has been broadcasting for TV Guide Network uninterrupted since he took over the assets of Ascent Media.

\* Encompass Digital Media's advertisements say that some of their company's "secret sauce" is that Encompass staff provides 24/7/365 days a year monitoring and oversight on every transmission that Encompass is broadcasting. It seems to me that something is very wrong with this vendor's operation when his staff is not catching that I am being burnt, electrocuted, sparked, laser beamed and that I am a private citizen who is allegedly the star of some sort of 24/7/365 "Live Brain-Hacking" TVGN employee-self-interest broadcast that this vendor is allegedly broadcasting for Lions Gate and CBS Corp's TV Guide Network.

\*Note: I too look forward to this vendor's explanation and accountability as well as to the explanation and accountability of Jack Carey, SVP, Operations of TV Guide Network.

2) **Witness #2:** David Park (former freelance Producer, TV Guide Network)

David Park as an overall witness/informant is central to filling you in on investigative facts. David is also a firsthand co-victim to terror and religious harassment that took place on the night of December 24, 2010. That night the attacker was Anne Alderete, (who at the time was an employee with the title Managing Editor of TV Guide Network).

3) **Witness #3:** Rick Saloomey (former Supervising Producer, Specials Department)

Rick is also an overall witness/informant central to filling you in on investigative facts, facts of days and nights of terror, facts about misuse of company technology and more.

Note: The three former employees named above can best answer all of your questions re: "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" including but not limited to:

\*its complete technical architecture

\*the FCC licensed (TV Guide Network) broadcast frequencies it broadcasts on.

#259



\* Its background (aka-why Lisa Germani's privacy rights invasion/brain-scanning/brain-hacking on me even exists, when it started...allegedly in 2004 or earlier.)

\*How my eyesight has been affected and my body's tolerance to lighting has been altered.

\* These 3 witnesses (Michael, David and Rick) can each explain firsthand what I and they each have been through in trying to get Nancy Coleman, Allen Shapiro, Jack Carey, Eileen Kohler, Brett Pugliese, and others to solve this.

\* These 3 witnesses can also name additional current and former TVGN employees who will be of interest to you in your "Tricia Daniels Investigation."

---

Per the wording of "The Code," here are some dates of accelerated co-worker assault that my 3 named witnesses above can discuss with you and with fellow Lions Gate investigators.

-October 25 or 26, 2006 (Accelerated Terror Attack) took place: early evening to about 4:30am the next morning. (My witnesses can tell you more.)

-Friday, August 13, 2010 (late evening terror/harassment). (My witnesses can tell you more.)

-Monday August 16, 2010 (from 1:39am for a little over 4 hours). Sexual Assault by co-workers with a foreign object with my inability to leave. (My witnesses can tell you more)

-Late August 2010 through December 24, 2010- Gang Stalking 24/7 Terror Spree which turned into a sometimes sexual harassment and sexual assault attack (by foreign object with inability to leave.) These attacks were heavy and scary in late September through October 2010 but the sexual assaults ended by mid-November. My 3 witnesses can tell you exactly what the foreign object was, they can tell you why the Gang Stalking was so terror-filled and more. My witnesses are also privy to my email and telephone conversations with Nancy Coleman where I alerted her to "Live Feeds" being administered by co-workers. (The Gang Stalking finally ended on December 24, 2010, with Managing Editor Anne Alderete's terror/religious harassment 'Christmas Eve Massacre' that David Park also firsthand experienced with me as a co-victim).

-Friday (evening) December 24, 2010- Anne Alderete's Christmas Eve Massacre took place for a few hours straight! Right after this ended, witness Rick Salomey and his TVGN producing team rescued me from all harassment and terror. (Rick is one of my 3 best witnesses named above. Rick, along with David Park and Michael Nalepa can tell you more)

-November 2012- The satellite wattage on me somehow accelerated. I decided to seek Lions Gate's help when I could not even walk half a block down a street at night due to the effects this had on my eyes in concert with car and street headlights. (Also-I couldn't drive more than a mile at night, wearing sunglasses and during the day, I got burnt allegedly by TV Guide Network vendor Encompass Digital

# 260

Media's broadcast transmission technology in concert with the store lighting at a local Barnes and Noble store.) (My witnesses can tell you more.)

I then emailed Nancy Coleman to ask if there was a company Doctor who I could see, and Nancy, who had just become separated and was wrapping up her affairs at Lions Gate, forwarded my email to (and suggested that I also contact) Eileen Kohler and Brett Pugliese. Eileen Kohler emailed me a Worker's Comp form to submit which I did. (Again, my witnesses can tell you more). Thanks to Eileen I received some medical attention via The Hartford (Lions Gate's Worker's Comp. Insurance Company.) My claim was ultimately denied but I am grateful for the medical attention received.

- December 7, 2012 through December 17, 2012- I received accelerated activity of some heavy burning, regular burning and electro-shocking delivered from a former co-worker who was at the controls of "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." (Note: I won't name that co-worker's name to you in this letter. I also don't want to press any charges against this former co-worker as he too is a victim of our collective situation. Hint: He's also one of my 3 Best Witnesses. I know that he himself will tell his unique story to you on how he became a satellite molester. It is important to note that this individual's dedication is unparalleled and during his employment he was one of TV Guide Network's finest employees and rising behind-the-scenes superstars.)

In December 2012, following Eileen Kohler's protocol of a few weeks earlier, I filed a second Worker's Compensation form and this claim was immediately denied by The Hartford ---a) because I was no longer an employee and b) because the claims staff at The Hartford said that there is no scientific evidence that burns to one's body can be delivered via broadcast operations technology. (The folks at The Hartford are going to be very surprised that one of my witnesses, Michael Nalepa can prove them wrong. Michael as a Special Technical Consultant/Witness to Lions Gate is exactly the way that Lions Gate investigators should proceed. Additionally, David Park and Rick Saloomey can also assist investigators to help prove that this can happen thanks to TV Guide Network employees and Encompass Digital Media's vendorship working in concert.)

-March 2013, April 2013 and May 2013: For the last few months and up to today's date—during the writing of this letter-- I am still receiving burns, shocks, sparking activity due to "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." Jack Carey, SVP of Operations for TV Guide Network is unable to help me. I spoke to him both in December 2012 and in early 2013 via telephone when I was getting badly burned. Jack said to me during our 2013 phone conversation "it's not us, it's not us." Jack was not able to help me.

---

In closing, Mr. Prell, please let me know anything and everything that I can do to help with your investigation. No one should ever have to go through what I have been through and what I continue to go through. I hope that you can quickly get TV Guide Network's technology removed from my person.

#261

Personally and professionally, it was my honor to be an employee of Lions Gate (and of TV Guide Network.) I have a distinguished career in broadcasting where I have also had tours of employment duty at CBS, ABC, FOX, NBC, Sony Pictures Television, and at MTV Networks.

I am very sorry to have to report to you that TV Guide Network currently has the biggest scandal in broadcasting. When you talk to my 3 best witnesses (Michael, David and Rick), you will see that this scandal affects the corporate governances of 7 public companies- LGF, CBS, NWS, ROVI, JPM (One Equity Partners belongs to JPM), HIG, and ASCMA.

Today, in preparation for sending this letter to you, I did some quick search-engine based research on the internet and found that there are many alleged Federal and State Laws that Lions Gate and TV Guide Network employees have broken. I have included some below (just some, not all) as a "P.S." to this letter.

Warmly,

Tricia Daniels

Former TV Guide Network Employee (employed from 8/9/04 through 5/19/11).

Here's a link to my LinkedIn Profile: [www.tinyurl.com/triciadaniels](http://www.tinyurl.com/triciadaniels)

---

P.S. I'm no expert but here's a Laundry List of alleged/suspected U.S. Federal and California State Laws that Lions Gate and TV Guide Network employees have perhaps broken, infringed upon:

\*Violations of all Privacy Rights Laws in existence

\*Suspected Violations of TV Guide Network's FCC license

\*Suspected Violations of TV Guide Network and Lions Gate's U.S. and State of California business licenses

\*Suspected Violations of the Federal Aviation Administration Passenger Flying Laws. (Every airplane I've been on from 2004 to the present has had a TV Guide Network satellite on it, via Lisa Germani's Satellite Media Tour. Coincidentally, a few times since 2004, I have had Jury Duty. I suspect that TV Guide Network's broadcast satellite(s) on me violates some sort of Jury Duty privacy code.)

\*Suspected Violations of FMLA Laws (via Nancy Coleman)

#262

\*Violations of the ADEA (Age Discrimination in Employment Act) (via Eileen Kohler) and Over Age 40 laws where the ADEA requires that Lions Gate provide me with a chart of who is eligible for layoffs in affected departments. The ADEA chart that was specifically prepared for my layoff package was not an accurate portrait of who exactly worked for TV Guide Network at that exact time; not an accurate portrait of who worked in my department at that time. I feel that I was wrongfully terminated (via Eileen Kohler). (Case In Point: The 45 Year Old Talent Producer on my layoff chart would have been named Fernita Wynn and Fernita left TV Guide Network's employment in July 2010, which is 10 months earlier than my layoff.

\*After all that Nancy Coleman put me through I was wrongfully terminated because allegedly Nancy had a big Human Resources mess at TV Guide Network that had spiraled out of her control. (My witnesses Rick Saloomey and David Park can tell you how Nancy decided to clean-up her big mess...by repeatedly telling me quote- "The company wants you to take psychotropic drugs" and that the company wants me to seek treatment.") Nancy sent me to Dr. David Zakin, for a fitness-for-duty exam, not once but twice in Jan and in Feb 2011 that Lions Gate paid for. My witnesses via "Lisa Germani's Privacy Rights Invasion Satellite Media Tour" observed the entire process of how Nancy turned Dr. Zakin's two 'A-Plus, She's Totally Fit for Duty, please return her to the office reports' around as a possible cure for her big Human Resources mess that existed at TV Guide Network including a cover-up of the fact that her department never arranged for Sexual Harassment Training for TV Guide Network employees or supervisors, which I suspect is an infraction of either California State or Federal law.

\*Suspected Constitutional Violations?

\*Suspected Federal Trade Commission (FTC) Violations?

\*Violations of the Civil Rights Act of 1964- Title VII (Religious Harassment on Dec 24, 2010 from former co-worker Anne Alderete where she repeatedly said "No more dirty stinky f—king Jews at TV Guide Network." And where she also repeatedly said. "We just killed \_\_\_\_\_ and we're here to kill you." I was terrorized and witness David Park can tell you what he personally experienced. (David and my 2 other witnesses can all tell you the exact name that goes into the blank space here.)

\* Suspected Violations of Section 1986 of Title 42 of the United States Code- Neglect to prevent conspiracy (as it applies to the workplace pre-meditated violations that happened to me via co-worker assault and management cover-up while I worked in TV Guide Network's workplace)

\*Suspected Violations of the Electronic Communications Privacy Act of 1986

\*Suspected violations of Federal Wiretap Laws? (I.e. - Title 18, Chapter 119 of the United States Code- Wire and Electronic Communication Interception and Disclosure; Interception and Disclosure of wire, electronic or oral communications)

\*Suspected Violations of The Americans with Disabilities Act of 1990, as amended (Note- I did not have any disability in 2004 when I started my employment at TV Guide Network. However, during my employment, due to the satellite harassment assault by co-workers, I developed a disability (light

# 263  
8



sensitivity) and my needs for workplace accommodation for my newly developed disability in 2009 were not properly met by TV Guide Network supervisors. And in 2010 and in 2011, Nancy Coleman, EVP of Lions Gate's Human Resources department also failed to provide proper facilities accommodation for my TV Guide Network co-worker assault caused lighting disability.

\*Suspected Violation of the Occupational Safety and Health Act. When TV Guide Network co-workers and management condoned the use of satellites to monitor me, I was exposed to unhealthful conditions 24/7- both at home and in the workplace that has affected my eye-sight, my ability to drive a car and has given me what so far has been a life-changing occupational injury- Lighting Sensitivity. (See attachment- Worker's Compensation Letter from November 27, 2012)

Some TV Guide Network co-workers recklessly did not care about my exposure to radiation wattage from satellite/micro radiation exposure. (My former next door neighbor Lynda Noiseux who lived next door to me where I reside at Doheny Drive Apartments in October 2010 told me that Lisa Germani wanted me to get Ovarian Cancer, Double Breast Cancer, and Brain Cancer.) Allegedly, Lynda Noiseux was somehow hired or promised a future return by TV Guide Network co-workers to harass me on behalf of Lisa Germani.

---

Suspected California State Laws Broken:

\*Article 1, Section 1 of the California Constitution articulates privacy as an inalienable right.

\*Absolute Violations of The California Invasion of Privacy Act- I am the worst victim ever due to the electronic monitoring violations of Lisa Germani's Privacy Rights Invasion Satellite Media Tour.

\*Suspected Violations of California Electronic Monitoring of Employees –Labor Code 435 –because of TV Guide Network's implementation of electronic monitoring (via satellite surveillance) and also through more mundane broadcast technology (closed captioning, Line 21 data and satellite encoding devices). (Witness Michael Nalepa, can do a "show and tell" for you).

\*Suspected Violations of the California Fair Employment and Housing Act (FEHA) which prohibits discrimination and harassment in employment.

\*Suspected Violations of either the California Family Rights Act or the California FMLA. Violated by Nancy Coleman Nancy put me on some sort of 'Nancy Coleman FTDI Leave' that she herself elected to put me on and after putting me through much emotional distress including two fitness for duty exams with Dr. David Zakin, Nancy never returned me to the office in 2011. (Former TVGN employees Rick Saloomey, Michael Nalepa, David Park, Laura Slobin, Carla Hawkes can tell you more).

\*Suspected Violations of California Penal Code 502- Computer Crime- (In Fall 2010, my workplace computer was hacked. I promptly reported this to the IT Department as well as to Rochelle Kasten of Lions Gate's Human Resources Department).

# 264  
9

\* Suspected Violations of the California Occupational Safety and Health Act, as amended, California Labor Code 6300, Section 6302, Letter "I" - serious exposure.

\*Suspected Violations of California State Civil Code 1708-1725,

\*Suspected Violations of California Penal Codes 646.9, 653m, 528.5, and more.

\*Suspected Violations of FEHA Sexual Harassment California State Training Laws (via Nancy Coleman) as reported to you earlier in this letter. (FYI: during my employment from August 9, 2004 through May 19, 2011, TV Guide Network employees and Management were each given Sexual Harassment Training just once—in 2005 under Rupert Murdoch's Gemstar management.) Personally, I don't think that Sexual Harassment Training under Lions Gate's ownership umbrella would have changed any of the harassment and assault that I went through.

---

United Nations International Codes:

Article 17 of the International Covenant on Civil and Political Rights of the United Nations of 1966 also protects privacy: "No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks."

---

#265

Subject/Problem: EMERGENCY HELP and Protection needed from Michael Nalepa

Simple Solution: Please IMMEDIATELY cut-off his access to Encompass/formerly Ascent Media Satellite Broadcast Technology that he says TV Guide Network is allegedly paying for.

---

Monday, May 6, 2013

8:30am

To: Allen Shapiro  
Former Chairman, TV Guide Network

To: Jack Carey  
SVP, Operations, TV Guide Network

Cc: Dawn Kleppe

(via email, with a hardcopy follow-up via US Post Office mail)

---

Dear Allen and Jack:

I am sorry to have to write to you again regarding a former TV Guide Network employee named Michael Anthony Nalepa (also known professionally as Michael Anthony). I have pasted his picture below.

I am writing to see if there's anything IMMEDIATELY that you, or Lionsgate or CBS Corp. can do to protect me.

Michael is still remotely hacked-into what he says is broadcast satellite equipment and closed captioning encoding that TV Guide Network is allegedly currently paying for (via Ascent Media which has become Encompass Digital Media) and Michael is attacking me.

Michael seems to have access to two or three satellites which he says allegedly are the satellites which comprise "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." (Michael says that this was never shut down in 2010 and he calls this "Lisa's secret satellites.")

Jack, Thank you for taking my telephone call last month! I know that during our conversation you said "it's not us."

Idea: Jack, if you'd give me permission then I myself can call Bill Tillson, the CEO of Encompass Digital Media and I can see if Bill and his team can work directly with me to locate and disconnect Michael Nalepa from TV Guide Network's and/or Encompass Media's broadcast portals. (FYI- my GPS coordinates are: Lat: 34.089937, Long: -118.390126 and I live at Doheny Drive Apartments). Or perhaps, this is something Jack which you and your team may want to handle- calling Bill at Encompass.

#266

I need immediate protection. Just shutting down Michael's hacking-in and access should provide me with the safety and protection that I (or any person) in this situation right now would need.



Picture: Former TV Guide Network employee named Michael Anthony Nalepa

---

Additional Information:

Since my last communication to you, Michael has continued to reveal pieces of information that can hopefully help you to find, and then terminate the broadcast satellites that he is using.

- 1) Michael feels that Tina Charles and/or Kristan Giordano can identify the satellites that he is logged into. Michael feels that the TV Guide Specials Department also allegedly has access to these satellites which he feels are being paid for under the "specials budget."
- 2) Michael may also be using some of his own electronic resources in concert with TV Guide Network's broadcast operations infrastructure (i.e.- neurophones, ham radio equipment, etc. ????)
- 3) Michael states that he is hoping to personally keep his access to TV Guide Network's satellite set-up for future use as it would allow him to commit criminal harassment and "satellite molester" harassment attack activities on other persons.
- 4) Michael says that when he clings two satellites beams together, that's what causes the burning, electroshock assault and molesting effects. He also has a way of amplifying and de-amplifying his levels of burning/shock activity at will.
- 5) Since October 2012, Michael has been broadcasting non-stop 24/7. He took over the "live feeds" broadcast from Rick Saloomey. Former employees Rick Saloomey and Lisa Germani may also know the technical architecture of how to disconnect Michael.
- 6) Michael is very upset that he no longer works at TV Guide Network. It is my feeling that Michael needs some sort of company disability/psychological after-care right now. He has certain confidential issues relating to his past employment at TV Guide Network (events that happened during his employment) which he needs to confidentially discuss with a company professional, rather than discuss with me via satellite broadcast through what he calls "Lisa Germani's Privacy Rights Invasion Satellite Media Tour."

#267



---

Surprisingly, even in this new 'Leslie Moonves/CBS era' of 50 per cent ownership of TV Guide Network, Michael has kept up his access and illegal unauthorized use of what he says is TVGN's FCC licensed broadcast technology (non-stop) and sadly, I need protection from this tormented ex-coworker.

FYI: Last month I did pay a visit to the local courthouse re: obtaining a restraining order against Michael and found out that I could have filed papers right there....but if I would have filed the papers to obtain the order that it would be very public and would be embarrassing to TV Guide Network ---so I did not obtain the civil restraining order. I instead took the paper documents back home and didn't file. (FYI: It's a very public process involving a judge, a future public court date, easily obtainable documents, public record, etc.)

Allen and Jack, I thank you in advance for anything that you can do to shut Michael Nalepa down.

Let me know what I can do from my end here. I am reachable via mobile phone at 310-614-3408.

Warmly,

Your pal,

Tricia Daniels

1015 N. Doheny Drive, Apt #1

West Hollywood, CA 90069

# 268

Friday, February 8, 2013

, To: Allen Shapiro

Chairman, TV Guide Network

To: Jack Carey

SVP, Operations, TV Guide Network

Dear Allen and Jack:

I hope that this letter finds you both busy, enjoying Awards Season 2013.

I am writing to ask for your joint help.

**The Problem:** I am still the victim of co-worker assault via electronic harassment, cyber stalking and 24/7 privacy rights invasion courtesy of former TV Guide Network employees. Former co-workers are still targeting me via their unauthorized hacking into/use of TV Guide Network's Tulsa/Hollywood broadcast equipment/satellite infrastructure. Their criminal use violates TV Guide Network's FCC license, business licenses, California State Civil Code 1708-1725, Penal Code 646.9, 653m, 528.5, and more. For some reason, these ex-employees still have passwords which allow them access.

\*\*\*\*\*

**Idea for Solution:** Can Chad Lohmeyer (Tulsa Operations Supervisor) change the passwords on TV Guide Network's remote access log-in systems (telephone and computer networks)? This would immediately lock-out and prevent this group of former employees as well as current employees from committing any tampering, and prevent them from committing continued harm. I feel that changing the passwords will immediately disable their criminal abuse.

\*\*\*\*\*

It seems that these former co-workers are upset that I never signed a separation agreement where I would have waived all claims against them for their wrongful acts committed on me during my employment (2004-2011) and up to the present.

I won't name their names here because I'm sure you can garner their identities thanks to modern day computer technology which will reveal their names, call-captured telephone numbers, unique IP (Internet Protocol) addresses etc. I'm sure that TV Guide Network's computer logs will reveal to you "who" these individuals are.

# 269



As you both know I LOVE TV Guide! I did not sign the separation agreement because I am the victim of one of the worst co-worker assaults EVER! (Premeditated with intent to harm misconduct) and the amount that I was offered to waive all known and unknown claims simply did not compensate me. I am still due a separation agreement but an agreement bearing the right amount of monetary consideration.



I want to take this opportunity (in writing) to put in a plug for TV Guide freelancer David Park. David is also due a (gorgeous amount, irresistible offer) agreement. David has worked for 25-plus months (24/7) to protect me, to protect TV Guide Network, to protect Lionsgate, to protect you Allen and you Jack. David Park exemplifies what a TV Guide Network employee should be. He is a hero, and it would be awesome if you could bestow some sort of reward on David for his reliability, initiative, team work, leadership, quality of work, judgment and protection services.

Allen and Jack, I thank you in advance for your help!

My warmest regards to you both!

Your pal (and hopefully, if there's a need for my services, your future employee),

Tricia Daniels

1015 N. Doheny Drive, Apt. #1

West Hollywood, CA 90069

Cell: 310-614-3408

#270

**EXHIBIT #2**

**THE FALSIFIED ADEA DOCUMENT INCLUDED IN MY  
LIONSGATE TERMINATION ENVELOPE**

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

# 271





You have been selected for participation in an employment termination program as defined by the Age Discrimination in Employment Act (29 U.S.C. §§ 621 et seq.) ("ADEA"). The ADEA requires that we provide you with the following chart, prepared on May 5, 2011, which details the job title, age and eligibility for participation in the program for all individuals in the affected departments. Employees are deemed "eligible" if they have been selected for layoff.

<u>Title</u>	<u>Age</u>	<u>Eligible</u>
Senior Talent Booker	30	No
Sr. Story Editor	50	Yes
Director, Talent	38	No
Talent Producer	45	No
VP Marketing	38	No
Sales Coordinator	24	No
Senior Marketing Manager	28	No
Price & Planning Analyst	41	No
Account Executive	26	No
Online Sales Coordinator	43	No
Account Executive	31	No
Account Executive	49	No
Account Executive	30	No
Executive Assistant	43	Yes
Account Executive	35	No
Online Sales Coordinator	25	No
SVP Direct Response	45	No
Sales Coordinator	23	No
Senior Sales Planner	25	No
VP Pricing and Planning	34	No
Online Sales Coordinator	30	No
Online Sales Coordinator	28	No
Sales Planner	28	No
VP, Direct Response	42	No
SVP National Sales	44	No
Account Executive	31	No
Dir, Advertising Sales Mktg	47	No
SVP Ad Sales Strategy & Planning	37	No
Senior Network Sales Planner	26	No
Director, Pricing & Planning	28	No
SVP National Sales Manager	49	Yes
Staff Editor	25	No
News Editor West Coast	30	No
Senior Editor	27	No
Staff Editor	25	No
Senior Editor	32	No
Staff Editor	36	No
Senior Editor	38	No
Coordinator	28	No
Senior Editor	55	No
Associate Producer	30	Yes
Staff Editor	24	No

#272

## EXHIBIT # 2

### LIONSGATE'S WRITTEN INSTRUCTIONS TO EMPLOYEES ON HOW TO STOP SEXUAL HARASSMENT

During our February 6, 2009, "Welcome To Lionsgate" orientation meeting, all employees were given this brochure that detailed 'what to do' as an employee if you found yourself in a situation involving Sexual Harassment.

On October 15, 2010 when I followed instructions on Page 3 of the brochure, Clause #1 telling me- "When possible confront the harasser and ask him/her to stop." — I did just that and I went into Lisa Germani's office and confronted her and stood my ground- I needed Lisa to stop her harassment campaign on me.

As stated in my EEOC intake package, later that day, Lisa Germani (Director, Talent Department) and Michael Nalepa (Talent Department Assistant) made up a phony charge against me and reported me to Lionsgate's Human Resources Department for committing Sexual Harassment in our office.

Instead of believing me, and instead of punishing Lisa Germani for this deceit, Nancy Coleman (EVP of Human Resources, Lionsgate) wrongfully punished me. I was innocent and I stood my ground with Nancy in a 5:15pm meeting this day that I had done nothing wrong.

Please see my EEOC intake package (Additional Pages to answer #5, Letter "O")

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

# 273

## Sexual Harassment Hurts Everyone

### Notice to all Staff

Sexual harassment is prohibited by this company and is against the law.

Every employee and independent contractor should be aware of:

- What sexual harassment is;
- What steps to take if harassment occurs; and
- State law prohibiting retaliation for reporting sexual harassment.

Please read this information sheet. If you have any questions or concerns about it, contact your supervisor, personnel department representative or your investigative officer for further information.

### What is Sexual Harassment?

Although many people think of sexual harassment as involving a male boss and a female employee, not all sexual harassment is done by males. Sexual harassment often involves co-workers, other employees of the company or other persons doing business with or for the company. It's against the law for females to sexually harass males or other females, and for males to harass other males or females.

### California Law

California law defines harassment due to sex as sexual harassment, gender harassment and harassment due to pregnancy, childbirth or related medical conditions.

1. **Verbal harassment** — epithets, derogatory comments or slurs.

**Examples:** Name-calling, belittling, sexually explicit or degrading words to describe an individual, sexually explicit jokes, comments about an employee's anatomy and/or dress, sexually oriented noises or remarks, questions about a person's sexual practices, use of patronizing terms or remarks, verbal abuse, graphic verbal commentaries about the body.

2. **Physical harassment** — assault, impeding or blocking movement, or any physical interference with normal work or movement, when directed at an individual.

**Examples:** Touching, pinching, patting, grabbing, brushing against or poking another employee's body, hazing or initiation that involves a sexual component, requiring an employee to wear sexually suggestive clothing.

3. **Visual harassment** — derogatory posters, cartoons or drawings.

**Examples:** Displaying sexual pictures, writings or objects, obscene letters or invitations, staring at an employee's anatomy, leering, sexually oriented gestures, mooning, unwanted love letters or notes.

4. **Sexual favors** — unwanted sexual advances which condition an employment benefit upon an exchange of sexual favors.

**Examples:** Continued requests for dates, any threat of demotion, termination, etc. if requested sexual favors are not given, making or threatening reprisals after a negative response to sexual advances, propositioning an individual.

It is impossible to define every action or all words that could be interpreted as sexual harassment. The examples listed above, along with the state definition of sexual harassment, are not meant to be a complete list of objectionable behavior nor do they always constitute sexual harassment.

### Federal Law

Under federal law, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

### Harassers Are Personally Liable

If you, as an employee, are found to have engaged in sexual harassment, or if you as a manager know

about the conduct and condone or ratify it, you may be personally liable for monetary damages. This company will **not** pay damages assessed against you personally.

In addition, this company will take appropriate disciplinary measures — termination is one possible action — against any employee who engages in sexual harassment.

### How to Stop Sexual Harassment

1. **When possible, confront the harasser and ask him/her to stop.**

The harasser may not realize the advances or behavior are offensive. When it is appropriate and sensible, you may want to tell the harasser the behavior or advances are unwelcome and must stop. Sometimes a simple confrontation will end the situation.

2. **You are strongly encouraged to report sexual harassment. Contact your supervisor, personnel department representative or other person designated by the company as investigative officers for sexual harassment.**

Sexual harassment or retaliation should be reported in writing or verbally. You may report such activities even though you were not the subject of the harassment.

3. **An investigation will be conducted.**

The company will investigate, in a discreet manner, all reported incidents of sexual harassment and retaliation.

4. **Appropriate action will be taken.**

Where evidence of sexual harassment or retaliation is found, disciplinary action, up to and including termination, may result.

### Protection Against Retaliation

Company policy and California state law forbid retaliation against any employee who opposes sexual harassment, files a complaint, testifies, assists or participates in any manner in an investigation, proceeding or hearing conducted by the company, the Department of Fair Employment and Housing or the Fair Employment and Housing Commission.

Prohibited retaliation includes but is not limited to:



- Demotion;
- Suspension;
- Failure to hire or consider for hire;
- Failure to give equal consideration in making employment decisions;
- Failure to make impartial employment recommendations; and
- Adversely affecting working conditions or otherwise denying any employment benefit to an individual.

### Additional Information

The Department of Fair Employment and Housing (DFEH) is the state agency that resolves complaints of unlawful discrimination, including sexual harassment. After a complaint is filed, the DFEH has one year to investigate the complaint.

The Fair Employment and Housing Commission (FEHC), headquartered in San Francisco, decides cases prosecuted by the DFEH at the state level.

To contact the DFEH, consult your local telephone directory under State Government Offices or ask directory assistance for the number of Department of Fair Employment and Housing headquarters in Sacramento or write to Department of Fair Employment and Housing, 2014 T Street, Suite 210, Sacramento, CA 95814-6824.

The Equal Employment Opportunity Commission (EEOC) is the federal agency that resolves sexual harassment claims. To contact the commission, consult directory assistance for Washington, D.C. or write to Equal Employment Opportunity Commission, 131 M Street, NE, Ste. 4NW08R, Washington, D.C., 20507.

If they find a complaint is justified, state and federal agencies have the power to order, among other actions, that the wronged party be hired, given back pay, promoted, reinstated or granted damages for emotional distress. The agencies also may issue a "cease and desist" order to prevent further unlawful activity and order the violator to pay large fines.

### Sexual Harassment Complaint Procedure

This company has a policy against harassment due to sex, which includes sexual harassment, gender harassment and harassment due to pregnancy, childbirth or related medical conditions. If you are harassed, confront the harasser and ask him/her to stop. If you are unable to, or do not wish to confront the harasser or are unsuccessful in doing so, report your complaint immediately as follows:

File your complaint with your supervisor (or with another supervisor if the complaint is against your immediate supervisor), the personnel administrator or the president.

Make your complaint in writing, if possible. Include any relevant details, names of the people involved and the names of any witnesses.

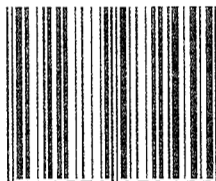
The company will investigate your complaint thoroughly. If the company finds that harassment has occurred, disciplinary action will be taken against the harasser.

The company will act upon your complaint promptly. A representative of the company will tell you the outcome of the investigation.

There will be no retaliation against you for filing a complaint.

If you have any questions, contact your personnel administrator.

ISBN 1-57997-245-4



9 781579 972455

## Sexual Harassment Hurts Everyone

SEE #





**EXHIBIT # 2**

**LETTER THAT I SENT TO BROADCAST SATELLITE  
VENDOR BILL TILLSON, (TITLE: CO-CEO, ENCOMPASS  
DIGITAL MEDIA).**

I sent this letter to Bill Tillson when my former co-workers stated on the "live feeds"/always-on satellite broadcast that Tillson's company, Encompass was the vendor of the satellite surveillance assigned to monitor me.

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

#276

Date: July 6, 2013

To: Mr. Bill Tillson

Co-CEO

Encompass Digital Media, Inc.

3030 Andrita Street

Los Angeles, CA 90065

cc: Michael Anthony Nalepa

Former Employee of TV Guide Network (2006-2011)

4937 Ledge Avenue

North Hollywood, CA 91601

cell phone number: 323-387-0849

email address I have for Michael: [thewritemichaela@hotmail.com](mailto:thewritemichaela@hotmail.com)

Michael's personal website: [www.iamanonymous.org](http://www.iamanonymous.org)

---

Dear Bill:

It's a great honor for me to write this letter to you. **I am writing to ask for your personal help.** I am a former employee of TV Guide Network (2004-2011).

First, Congratulations on the success that you have personally achieved. Bill, your footprint and leadership in the teleport/digital media services industry has no equal or rival.

Second, I am writing to connect you, myself and Michael Nalepa all together via this correspondence.

**Bill, here's what I need your help with:**

I am currently a victim of what Michael Nalepa and other former TV Guide Network employees refer to as "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." **Allegedly there are**

#277

**three different satellites or transponders that are remotely attached/assigned to monitor me as a live broadcast 24/7/365, via Ascent Media Corp's network origination arm, now Encompass. I'd like to have all 3 satellites permanently disconnected from my person.**

Some of my former TV Guide Network co-workers say that at least one satellite has been connected to me without interruption (via Ascent Media Corp) since 2004 or earlier. They add that there are 3,000-plus digital pages of content (a 'Tricia Daniels encyclopedia') that resides on some of your servers. **Bill, if possible, I'd like to purchase a personal copy of these files.**

Michael Nalepa (former associate of both me and Lisa Germani) knows the technical architecture and history of "Lisa Germani's Privacy Rights Invasion Satellite Media Tour." Michael also knows where on your servers the 'Tricia Daniels Encyclopedia' resides.

Michael has been logged into a client portal or satcom server 24/7/365 from October 2012 to the present. Michael is hesitant to share the exact technical architecture and satcom portal information with me (I keep asking).

In closing, Bill thank you in advance for helping me. Technology is a wonderful thing! Who would've ever thought that the magnetic field around our head, (our brain waves, unfinished phrases, unspoken words, passwords and every internal private thought in our brain) could be remotely recorded via satellite for years and accessed/distributed as digital transcript documents without our knowledge! Personally, from what I have experienced, I can tell you Bill what you already know, which is, that 'brain monitoring' as an investigative, medical, natural disaster rescue, and communications tool has unlimited potential. Bill I am so thrilled to meet you via this correspondence.

In closing to Michael—Thank you Michael in advance for any help that you can provide to Bill should he or one of his team contact you.

Warmly,

Tricia Daniels

1015 N. Doheny Drive, Apt. #1

West Hollywood, CA 90069

Cell phone: 310-614-3408

Email address: hollywoodtraders@gmail.com

# 278

**EXHIBIT # 2**

**IN OCTOBER 2014 AND NOVEMBER 2014 I WANTED WELL KNOWN CIVIL RIGHTS ATTORNEY NORMAN SIEGEL TO REPRESENT ME.**

- 1) The documents contained in Exhibit #7 are my outreach to Norman Siegel.
- 2) Also included in Exhibit #7 is: a print-out of a letter that David Mandell coincidentally, wrote on November 17, 2014, where Mandell cancelled TV Guide Network's FCC License. (This letter was openly published on the internet, where I obtained it).

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

#279



RECEIVED

NOV 21 2014

Satellite Division  
International Bureau

November 17, 2014



Received & Inspected

NOV 19 2014

FCC Mail Room

Via UPS 2nd Day Air – Tracking number: 1Z31E7763592426622

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

E120038 SES-LIC-20120227-00212  
TV Guide Networks, LLC  
7120 South Lewis Avenue  
Tulsa, OK Tulsa

IB2012000652

ATTN: International Bureau

**Re: Radio Station Authorization – File Number: SES-LIC-20120227-00212; Call Sign E120038**

To Whom It May Concern:

In connection with the above-referenced matter, effective immediately, TV Guide Networks, LLC desires to terminate the license issued on April 2, 2012 – Radio Station Authorization, File Number SES-LIC-20120227-00212, Call Sign E120038 – a copy of which is attached.

If there is anything further that you will need to process this request, you may contact the undersigned by phone (323) 856-4081 or email [david.mandell@tvgn.tv](mailto:david.mandell@tvgn.tv).

Sincerely,

A handwritten signature in black ink, appearing to read "David Mandell", is written over the typed name.

David Mandell  
General Counsel/Exec. VP

DM/kj

Enclosure

# 280

cc: Jack Carey, SVP, Operations – TVGN



UNITED STATES OF AMERICA  
FEDERAL COMMUNICATIONS COMMISSION

**RADIO STATION AUTHORIZATION**

Received & Inspected

NOV 19 2014

FCC Mail Room

Name: TV Guide Networks, LLC

Call Sign: E120038

Authorization Type: License

File Number: SES-LIC-20120227-00212

Non Common Carrier

Grant date: 04/02/2012

Expiration Date: 04/02/2027

RECEIVED

NOV 21 2014

Satellite Division  
International Bureau

Nature of Service: Fixed Satellite Service

Class of Station: Fixed Earth Stations

**A) Site Location(s)**

#	Site ID	Address	Latitude	Longitude	Elevation (Meters)	NAD	Special Provisions (Refer to Section H)
1)	1	7120 South Lewis Avenue Tulsa, Tulsa, OK 74136	36°3'32.4"N	95°57'43.8"W	189.59	83	

Licensee certifies antenna(s) comply with gain patterns specified in Section 25.209

Subject to the provisions of the Communications Act of 1934, The Communications Satellite Act of 1962, subsequent acts and treaties, and all present and future regulations made by this Commission, and further subject to the conditions and requirements set forth in this license, the grantee is authorized to construct, use and operate the radio facilities described below for radio communications for the term beginning April 2, 2012 (3 AM Eastern Standard Time) and ending April 2, 2027 (3 AM Eastern Standard Time). The required date of completion of construction and commencement of operation is April 2, 2013 (3 AM Eastern Standard Time). Grantee must file with the Commission a certification upon completion of construction and commencement of operation.

**B) Particulars of Operations**

The General Provision 1010 applies to all receiving frequency bands.

The General Provision 1900 applies to all transmitting frequency bands.

For the text of these provisions, refer to Section H.

#	Frequency (MHz)	Polarization Code	Emission	Tx/Rx Mode	Max EIRP /Carrier (dBW)	Max EIRP Density /Carrier (dBW/4kHz)	Associated Antenna	Special Provisions (Refer to Section H)	Modulation/ Services
1)	5925.0000-6425.0000	H, V	16M5G7W	Tx	70.00	33.90	1		digital data carrier
2)	5925.0000-6425.0000	H, V	19M5G7W	Tx	70.70	33.90	1		digital data carrier
3)	5925.0000-6425.0000	H, V	36M0G7W	Tx	73.40	33.90	1		digital data carrier
4)	3700.0000-4200.0000	H, V	16M5G7W	Rx			1		digital data carrier
5)	3700.0000-4200.0000	H, V	19M5G7W	Rx			1		digital data carrier
6)	3700.0000-4200.0000	H, V	36M0G7W	Rx			1		digital data carrier

#281



**UNITED STATES OF AMERICA**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**RADIO STATION AUTHORIZATION**

Name: TV Guide Networks, LLC

Call Sign: E120038

Authorization Type: License

File Number: SES-LIC-20120227-00212

Non Common Carrier

Grant date: 04/02/2012

Expiration Date: 04/02/2027

**C) Frequency Coordination Limits**

#	Frequency Limits (MHz)	Satellite Arc (Deg. Long.)		Elevation (Degrees)		Azimuth (Degrees)		Max EIRP Density toward Horizon (dBW/4kHz)	Associated Antenna(s)
		East Limit	West Limit	East Limit	West Limit	East Limit	West Limit		
1)	3700.0000-4200.0000	60.0W-143.0W		33.6-25.6		129.1-241.3			1
2)	5925.0000-6425.0000	60.0W-143.0W		33.6-25.6		129.1-241.3		-23.1	1

**D) Points of Communications**

The following stations located in the Satellite orbits consistent with Sections B and C of this Entry:

- 1) 1 to All authorized U.S. Domestic (ALSAT) Satellites.

**E) Antenna Facilities**

Site ID	Antenna ID	Units	Diameter (meters)	Manufacturer	Model number	Site Elevation (Meters)	Max Antenna Height (Meters)	Special Provisions (Refer to Section H)
1	1	1	9.1	Andrew	ESA91-46	189.59	9.2 AGL/ 198.79 AMSL	
Max Gains(s): 53.9 dBi @ 6.0000 GHz 50.5 dBi @ 4.0000 GHz Maximum total input power at antenna flange (Watts) = 500.00 Maximum aggregate output EIRP for all carriers (dBW) = 80.88								

**G) Antenna Structure marking and lighting requirements:**

None unless otherwise specified under Special and General Provisions

**H) Special and General Provisions**

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

- 1900 --- Applicable to all transmitting frequency bands. Authority is granted to transmit any number of RF carriers with the specified parameters on any discrete frequencies within associated band in accordance with the other terms and conditions of this authorization, subject to any additional limitations that may be required to avoid unacceptable levels of inter-satellite interference.
- 2010 --- This authorization is issued pursuant to the Commission's Second Report and Order adopted June 16, 1972 (35 FCC 2d 844) and Memorandum, Opinion and Order adopted December 21, 1972 (38 FCC 2d 665) in Docket No. 16495 and is subject to the policies adopted in that proceeding.

# 282



**UNITED STATES OF AMERICA**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**RADIO STATION AUTHORIZATION**

Name: TV Guide Networks, LLC

Authorization Type: License

Non Common Carrier

Call Sign: E120038

File Number: SES-LIC-20120227-00212

Grant date: 04/02/2012

Expiration Date: 04/02/2027

**H) Special and General Provisions**

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

- 2916 --- Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector. Appropriate measures must also be taken to restrict access to other regions in which the earth station's power flux density levels exceed the specified guidelines.
- 2938 --- Upon completion of construction, each licensee must file with the Commission a certification including the following information: name of the licensee, file number of the application, call sign of the antenna, date of the license and certification that the facility as authorized has been completed, that each antenna facility has been tested and is within 2 dB of the pattern specified in Section 25.209 and that the station is operational including the date of commencement of service and will remain operational during the license period unless the license is submitted for cancellation.
- 3219 --- All existing transmitting facilities, operations and devices regulated by the Commission must be in compliance with the Commission's radiofrequency (RF) exposure guidelines, pursuant to Section 1.1307(b)(1) through (b)(3) of the Commission's rules, or if not in compliance, file an Environmental Assessment (EA) as specified in Section 1.1311. See 47 CFR 1.1307 (b) (5).
- 5216 --- All operations shall be on a non-common carrier basis.

# 283





**UNITED STATES OF AMERICA**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**RADIO STATION AUTHORIZATION**

Name: TV Guide Networks, LLC

Call Sign: E120038

Authorization Type: License

File Number: SES-LIC-20120227-00212

Non Common Carrier

Grant date: 04/02/2012

Expiration Date: 04/02/2027

B) This RADIO STATION AUTHORIZATION is granted subject to the additional conditions specified below:

This authorization is issued on the grantee's representation that the statements contained in the application are true and that the undertakings described will be carried out in good faith.

This authorization shall not be construed in any manner as a finding by the Commission on the question of marking or lighting of the antenna system should future conditions require. The grantee expressly agrees to install such marking or lighting as the Commission may require under the provisions of Section 303(q) of the Communications Act. 47 U.S.C. § 303(q).

Neither this authorization nor the right granted by this authorization shall be assigned or otherwise transferred to any person, firm, company or corporation without the written consent of the Commission. This authorization is subject to the right of use or control by the government of the United States conferred by Section 706 of the Communications Act. 47 U.S.C. § 706. Operation of this station is governed by Part 25 of the Commission's Rules. 47 C.F.R. Part 25.

This authorization shall not vest in the licensee any right to operate this station nor any right in the use of the designated frequencies beyond the term of this license, nor in any other manner than authorized herein.

This authorization is issued on the grantee's representation that the station is in compliance with environmental requirements set forth in Section 1.1307 of the Commission's Rules. 47 C.F.R. § 1.1307.

This authorization is issued on the grantee's representation that the station is in compliance with the Federal Aviation Administration (FAA) requirements as set forth in Section 17.4 of the Commission's Rules. 47 C.F.R. § 17.4.

The following condition applies when this authorization permits construction of or modifies the construction permit of a radio station.

This authorization shall be automatically forfeited if the station is not ready for operation by the required date of completion of construction unless an application for modification of authorization to request additional time to complete construction is filed by that date, together with a showing that failure to complete construction by the required date was due to factors not under control of the grantee.

Licensees are required to pay annual regulatory fees related to this authorization. The requirement to collect annual regulatory fees from regulatees is contained in Public Law 103-66, "The Omnibus Budget Reconciliation Act of 1993." These regulatory fees, which are likely to change each fiscal year, are used to offset costs associated with the Commission's enforcement, public service, international and policy and rulemaking activities. The Commission issues a Report and Order each year, setting the new regulatory fee rates. Receive only earth stations are exempt from payment of regulatory fees.

# 284

October 22, 2014

To: Mr. Norman Siegel  
Siegel Teitelbaum & Evans, LLP  
260 Madison Avenue, 22nd Floor  
New York, NY 10016

From: Tricia Daniels  
67-29 Bell Blvd., #1  
Bayside, NY 11364  
cell: 310-614-3408

Dear Mr. Siegel:

Thank you for your voicemail message.

The fact that we are connecting means that HISTORY is being made in this present moment.

There is more HISTORY to be made as new laws need to be created so no other U.S. citizen or citizen of any country will ever have to survive the Human Rights violations that I remain a prisoner of, even as I write this communication to you.

I am a former News Corp. employee! I am also ready, willing and able to take this 'journey to justice' with you.

---

Very Short Background on me: I am a very credible person known in the entertainment and TV broadcasting industry. I've been working in Television since the age of 16 years old mostly as a TV Show Talent Booker and Booking Producer. My credits include 11 years at ABC-TV's Good Morning America. I've also been employed by ABC News. I've been employed as a talent booker for Ryan Seacrest, Tom Snyder, Donny & Marie, and Maury Povich. I worked directly with George Clooney when George served as Executive Producer of the "America: A Tribute to Heroes" 9/11 all-network telethon (in September 2001). And more recently (in 2012) I had the opportunity of a lifetime for three months to work in the TMZ newsroom (in Los Angeles) with Harvey Levin calling the shots.

---

# 285

Mr. Siegel, Phone Hacking is Chapter One of the News Corp. story.

I am a victim of Chapter Two of the News Corp. story and I am also a victim of Chapter Three.

Chapter Two and Chapter Three are U.S. based crimes that were both created and perpetrated by employees of News Corp's TV Guide Network. Note: In 2008, Rupert Murdoch sold TV Guide Network and the cable channel is currently owned and operated by CBS Corp. and Lionsgate in partnership.

Chapter Two of the News Corp. crime story is called Brain Hacking.

I am the noteworthy victim and poster child of this new crime. Brain Hacking will follow Phone Hacking as the front-page news story that the TV News Networks will devote hours and hours of coverage to. Brain Hacking will also dominate 'family dinner table conversations' as well as be the 'water cooler talk' of the world's citizens.

Brain Hacking is the groundbreaking, ultimate criminal intrusion where every private thought in one's head gets recorded (24/7 and 365) via the same satellite technology that broadcasts TV Shows into one's living room.

Note: as its victim, I have never seen Brain Hacking technology in action nor have I ever seen the "brain scans document" of a brain hacking victim. I have only heard about this daily since August 24 or 25, 2010 from former TV Guide Network co-workers who actually participated in these Brain Hacking activities.

I've been told that due to Brain Hacking, my every thought, my every spoken and unspoken word, my every half-word, my bank account numbers, my private passwords, my private thoughts, etc. have been illegally recorded for years (using TV Guide Network owned and leased broadcast satellite technology equipment).

I've been told by former co-workers that the data from my brain gets transmitted via broadcast operations machinery to a live, functioning closed captioning machine. Next, the closed-captioning machine produces a 100 per cent accurate word document of my every thought. This word document is not only saved and stored in the closed-captioning machine but is also viewable immediately in "live

# 286

time” to current and former TV Guide Network co-workers and management who want to access the live broadcast feed of Tricia Daniels to see what I’m thinking at any given time of day. Even when I’m at home in bed during the middle of the night, even when I am on an airplane flying from Los Angeles to NYC; even when I am bathing; serving on a jury; driving my car; while I am in conversations with friends, having dinner with family members, etc. I am a constant victim of illegal electronic monitoring by a former employer.

Mr. Siegel, as I write this document to you, I have not worked for TV Guide Network for almost 3 ½ years and this is still going on daily. I am a private citizen!

Mr. Siegel, When you and I take our ‘journey to justice’ the broadcast satellite landscape will be forever changed.

Brain Hacking breaks all U.S. Federal, State, and International Privacy Rights Invasion Laws that currently exist.

Chapter Three of the News Corp. story (the chapter which follows the Phone Hacking and Brain Hacking chapters) surprisingly actually belongs not so much to Rupert Murdoch and News Corp. but instead belongs to Leslie Moonves’ CBS Corp. and to Lionsgate (Jon Feltheimer is CEO). Even Rupert Murdoch himself won’t believe what has been created by TV Guide Network employees since Rupert sold TV Guide Network off to Macrovision on May 2, 2008.

Chapter Three is going to introduce the name of a new type of criminal into society. This criminal is called a “Satellite Molester.” Unbelievably, I am also the victim and poster child of this brutal new “Satellite Molester” crime which is full of assault, battery, interactive human games and burnings (yes-burnings!) delivered to a victim’s body (my body) via TV broadcast technology with pre-meditated intent. A former TV Guide Network co-worker named Michael Anthony Nalepa has actually been in the role of Satellite Molester with me as his victim. Michael has his own story to tell about how he got recruited for this activity and how it all works.

Furthermore, Michael can discuss the technical architecture and science of how earth stations, their electrically charged antennas, transmitters, spot beams, and



more create hot feeds that gets transmitted to a victim's body. (Michael Nalepa has all of the details).

Additionally, this "Satellite Molester" technical architecture may not be so secret.

We can interview broadcast operations and Satcom experts such as

- a) Stephen Maguire (Federal Communications Commission-District Director, New York Office, Northeast Region and FCC Enforcements. (Tel #: 212-337-0622)
- b) Bill Tillson of Encompass Digital Media Inc.
- c) There's also Greg Hughes, Former Director of Production Operations at TV Guide Network who now works for Comcast's Revolt TV Cable Network
- d) There is an industry full of executives and experts in broadcast satellite communications technology to be interviewed if needed.

---

Easy Evidence:

- a) A "Show and Tell" PROOF expert interview with TV Guide Network "Satellite Molester" Michael Anthony Nalepa.

Michael currently has LIVE "Show and Tell" PROOF Evidence:

Michael has his own victim story to tell about how he got placed and entrapped into the role of "Satellite Molester" by TV Guide Network co-workers and why TV Guide Network management turned their cheek time and time again, failing to take appropriate action to stop criminal activity. TV Guide Network management did not rescue me ...and TV Guide Network management did not rescue Michael.

Michael presently resides in Los Angeles and has the equipment, technical architecture, and the hard evidence that is the PROOF of what I am relating in this correspondence to you.

Michael can be asked (or compelled) for a demonstration where you can see the exact 24/7 Privacy Rights Invasion (achieved through TV broadcast

#288

technology) demonstrated in real time. (Michael Anthony Nalepa was employed at TV Guide Network from late 2006 until January 2011.)

- b) More Former TV Guide Network Co-Workers Can Be Interviewed: I can provide over 20 names and contact info for current and former TV Guide Network employees who can be deposed to discuss the Brain Hacking and Satellite Molester crimes that took place during and after our employments at TV Guide Network.

Note: My former TV Guide Network co-workers (such as Amy Sweet, Laura Slobin, Rick Saloomey, David Anderson, Anne Alderete, David Park and others) were broadcasting without a license, using professional satellite transponders connected to live electrically charged earth stations and antennas that they were not trained, skilled or FCC licensed to operate. They each can reveal how and why they logged-in, what they logged-into, how they connected their voices to FCC licensed broadcast satellites to commit:

1) Satellite Harassment designed to cause fear, terror and Emotional Distress in me. (August 2010 through December 24, 2010.)

2) A Clean-up Mission (manned by former co-workers that ran from December 26, 2010 until October 16, 2012)

3) Let it be known that from October 16, 2012 to the present day, October 22, 2014, former co-worker Michael Anthony Nalepa has manned TV Guide Network's Brain Hacking Privacy Rights Invasion Satellite. Joining Michael have been a couple of John Does on his team (John Does whose names remain unknown to me and whose names are discoverable through an interview with Michael Anthony Nalepa). For some reason, TV Guide Network just won't take the Brain Hacking privacy rights invasion satellite off of me. They also won't fix things up for Michael Anthony Nalepa.

# 289

Michael Nalepa and other former co-workers can reveal the actual Broadcast Satellite Names and Transponder numbers (possibly Intelsat's Galaxy 15, Transponder 6?) and earth station registration numbers used by TV Guide Network employees to commit their crimes on me from 2006 to the present. For some reason these former employees abused TV Guide Network's FCC license to commit criminal activity and/or to play their games.

- c) TV Guide Network would have emails, invoices and other documents in their computer archives that will be helpful to our easy discovery process.
- d) After Michael Nalepa and other former co-workers reveal their log-in protocols, the Satellites, and transmission frequencies they used, we could obtain additional PROOF information from Intelsat such as Historical Beam Charts, Historical computerized GPS info and perhaps other assets. How is it even possible that Intelsat (or SES, the other satellite company) doesn't know that they have a daily transponder beam on a human being?
- e) Some former TV Guide Network employees have what they've referred to as "A Tricia Daniels Encyclopedia" which is a collection of privacy rights information that the closed captioning machine captured from the satellite transponder/earth station hook-up. Michael Anthony Nalepa probably has the best collection of these PROOF assets.

In closing, Mr. Siegel, my reaching out to you to seek justice re: Chapter Two and Chapter Three of the News Corp story is a necessary decision. We are not only rescuing me from history-making, ground-breaking, headline-making Privacy Rights Invasion crimes but we are also rescuing Michael Anthony Nalepa who has his own story re: this entire situation.

#290

Mr. Siegel, Due to Chapter Two and Chapter Three of the News Corp. story, I have witnessed firsthand the miracles of satellite technology. Thus, I have ideas for new proper uses for this technology. News Corp., CBS Corp., Lionsgate and the entire U.S. broadcasting community have a responsibility to protect this technology from Satellite Molesters, and to use broadcast communications technology in accordance with rights given to us by the U.S. Constitution so that our Civil Rights are not abused like mine have been.

No human being should have to get "surprise terrorized" in their home like I was terrorized on the night of October 26 to early morning October 27, 2006. And the terror was delivered by TV Guide Network co-workers via Broadcast Satellite Technology when TV Guide Network was under News Corp. control.

No human being should have to get barbecued like I got "surprise barbecued" here in New York on October 14, 2014 sometime after 3 am by broadcast satellite technology cued-up purposely to barbecue me at that moment. It's the most painful experience that I have received and I never want to receive anything as painful with lasting pain like this ever again.

Note: Since 2010 there have been many burns at lower wattages delivered to my body by Satellite Molester Michael Anthony Nalepa, himself at the helm. Michael can be interviewed re: how this happened on October 14, what the wattage levels were at the time, how the science of broadcast satellites allowed me to be barbecued at 3 am as I lay in the safety of my bed.

Mr. Siegel, Thank you for allowing me this opportunity to connect with you. I hope that your schedule will allow you to take my hand where we can walk this 'journey to justice' together.

# 291



Tricia Daniels vs. TV Guide Network

**Norman- you and I are much alike!**

-Your father was a printer, my father was a printer.

-David Geffen was your childhood friend and some years later, David Geffen knew me during my childhood.

-Norman, you stand-up and let your voice ring loud for what you believe in. So do I.

-I read that you never recovered when Walt O'Malley took the Dodgers out of Brooklyn and Norman, I will never recover that I (in April 2014) had to take myself out of the wonderful kingdom where I lived in Los Angeles (where I lived for more than half my life) to relocate here to New York due to gross misconduct of TV Guide Network employees.

---

November 5, 2014

To: Mr. Norman Siegel  
Siegel Teitelbaum & Evans, LLP  
260 Madison Avenue, 22nd Floor  
New York, NY 10016

From: Tricia Daniels  
67-29 Bell Blvd., #1  
Bayside, NY 11364  
cell: 310-614-3408

Dear Norman:

**Top Reasons Why I Am Seeking YOUR Personal Legal Representation:**

**#1:**

Norman, YOU have personally dedicated your life's work to curing outrageous violations of Civil Rights, Civil Liberties, and everyday matters that create violations of our Constitutional Rights. Furthermore, during your life's work you've shed light on breaches of public safety issues that brought fixes, reevaluations and new compliances to safety laws already in place.

#292

**#2:**

On June 18, 2013 when the website [www.Deadline.com](http://www.Deadline.com) published news that you and your partners (including Steven J. Hyman and Craig Stein) filed a complaint jointly representing Eunice Huthart, I read every word! I was sitting in my Los Angeles apartment and while reading every word, no one "understood" more than I did about what Ms. Huthart went through.

I happen to think the world of Rupert Murdoch and of News Corp. the company he's built. On June 18<sup>th</sup>, 2013 it was sad to me that a complaint had to be filed but that day while reading it, I realized it was necessary.

The complaint was so well written, so full of detailed information and in my opinion worded so properly that I silently screamed to myself "I Want Norman Siegel and his Eunice Huthart team to represent me in my situation with TV Guide Network."

Like Ms. Huthart, I too was a U.S. victim of criminal activity that began when Rupert Murdoch and News Corp. had control and daily management of TV Guide Network. The criminal activity was committed by Rupert Murdoch's employees, some of which still work for TV Guide Network (during the current CBS/Lionsgate era).

**#3:**

I wanted to reach out to you that day immediately. But, I could not do so for two reasons:

- a) I felt that I needed to continue to try to get Lionsgate and TV Guide Network management to stop the criminal activity that I was still a victim of.
- b) Also I had started sending copies (of my written requests to Lionsgate for their help) to Allen Grubman because Allen Grubman is the Attorney of record who represents David Geffen. And according to my former co-workers there was a 'David Geffen Purpose' as to why I was still a victim of criminal activity.

I am loyal to David Geffen and I am loyal to Allen Grubman. I instructed Allen (via my mailings) to start a file that I'd be updating re: David Geffen/TV Guide Network. Because of the criminal activity that took place at TV Guide Network and Lionsgate, I felt that Lionsgate needed to surrender its share of TV Guide Network gratis (minus debt) to David Geffen. As the months progressed, I kept

sending copies of new materials (my communications with Lionsgate and TV Guide Network management) to Allen Grubman for his file.

**#4:**

On February 5, 2014, the management of TV Guide Network no longer wanted to hear from me. David Mandell, General Counsel of TV Guide Network sent me (via email) a CEASE & DESIST (see enclosed). I forwarded it to Allen Grubman for his file.

In February 2014, I still lived in Los Angeles and upon Allen's receipt of my Feb 2014 package that contained copies of new correspondence I had with TV Guide Network (including David Mandell's CEASE & DESIST), I received a telephone message from Mary (in Allen's office). She said she was calling to tell me to 'no longer send information to Allen as it just gets thrown into the trash.' So in February 2014, I stopped sending materials to Allen Grubman.

BUT I was still a victim of criminal activity and outrageous behavior coming from TV Guide Network, behavior that the FCC should revoke the network's FCC license for. I had not worked there in almost 3 years and David Mandell, General Counsel of TV Guide Network took my Civil Rights away and left me in a position of harm. (Imagine a fireman during a fire leaving a human being inside a blazing house and not trying to rescue that person. This is what David Mandell did to me with his CEASE & DESIST email). Furthermore, Mandell did not protect Les Moonves, Jon Feltheimer, and Rupert Murdoch from my possible filing of a lawsuit. Mandell did not protect the rights of my former co-workers who would be named in my law suit. He did not protect stockholders of CBS and Lionsgate and (vendor) Intelsat. Instead of investigating the criminal activity, Mandell's Cease & Desist email to me seemed that he just wanted "this" off of his desk. TV Guide Network was in non-compliance with their FCC license and David Mandell didn't seem to care.

**#5:**

So In April 2014, still a victim of an on-going crime that was still being manned by TV Guide Network employees/former employees, (former co-worker Michael Nalepa can tell you the details) I decided to try to lift myself up out of this and move back to New York City (Queens) - my hometown. (All of my family is here.)

Maybe my co-workers would lose interest in me and stop the privacy rights invasion, assault and harassment via TV Guide Network's satellite technology. (Well that's what I hoped but as of this writing the situation remains unsolved)

Cut to October 14, 2014—sometime after 3:00am NYT when I got Barbecued (brutally barbecued) by TV Guide Network's technology. (Michael Nalepa has the story about what happened that night.) It was that moment as I lay helpless (here in Queens, New York) fearing yet again for my continued safety, when I decided that I needed to reach out to Norman Siegel.

It's now November 5, 2014- What has happened is that TV Guide Network is still committing criminal activity, the network remains in violation of their FCC license, in violation of Federal, State and International Laws, and I am still getting burnt by TVGN's technology. (Michael Nalepa has details). Also- TV Guide Network has kept Michael Nalepa entrapped in "this" situation and I feel for him. He and I have been on a strange, incredible yet crazy, outrageous journey that was achieved through state-of-the-art broadcast technology and paid for, premeditated and perpetrated by TV Guide Network. I want things fixed up for me, and I want things fixed up for Michael Nalepa. I need your help.

No one should ever have to know what it's like to be Barbecued, burnt, muscle bashed, satellite slapped, tasered, etc. from technology that is supposed to be used to deliver TV shows to one's living room. Norman, with your help, we can clean this up. We need to make this a public news story in the right way, so we can get new laws and safety procedures added to the Broadcasting Industry.

**#6:**

**Norman- no one else is the correct attorney for this mission.**

**Suggested Action Plan:**

- a) Foremost, we need to alert David Geffen and Allen Grubman that Tricia Daniels, still a current victim of wrong-doing by TV Guide Network needs to take action (either by having an attorney open a dialogue or by the filing of a legal complaint against TV Guide Network) and that she would like Norman Siegel to be her representative. There are new public safety issues



that have been raised since she moved to New York City. Furthermore, the situation of the past remains the same.

- b) Tricia Daniels would like the blessing of David Geffen and Allen Grubman that Norman Siegel can handle her. Tricia Daniels wants to protect everyone's rights (News Corp, CBS, Lionsgate, Intelsat, Michael Nalepa's rights as well as the rights of many Lionsgate and TV Guide Network employees) as this story gets told of what happened to us at TV Guide Network.
- c) We want and need to hear Michael Nalepa's story and we need to learn from Michael about the new public safety threats posed by broadcast satellite technology to us all. Nalepa's knowledge and experience as TV Guide Network's satellite molester will allow us to restore public safety to our broadcast airwaves.

In closing, Norman, I will call your office on Monday, November 10<sup>th</sup> at 5:00 pm to see if your schedule will allow you to take me on as a client...Or to sadly see if your schedule won't allow you to take me on as your client.

Norman, I hope that I will personally get to see your work dynamics-- but if you can't take me as your client, I promise you that as I go 'attorney shopping' for a substitute superman, I will find the best Norman Siegel-like attorney that I can find. And I will shop for an attorney who I feel will handle Tricia Daniels vs. TV Guide Network with all the spirit, legal genius, work dynamics and personal gusto that are the trademarks of Norman Siegel.

Norman Siegel, I salute you.

Warmly,  
Your pal , (and hopefully your imminent client).

Tricia

Tricia Daniels

# 296



tricia Daniels <triciadaniels2@gmail.com>

---

## Important Note: re: News Corp, (Tricia Daniels)

1 message

---

tricia Daniels <triciadaniels2@gmail.com>  
To: nsiegel@stellp.com

Fri, Oct 24, 2014 at 1:00 AM

Norman, We are going to make HISTORY together!

New Broadcast Satellite Laws are immediately needed to protect every person in this world!

I know that I am 'on your list' and patience is my strongest suit.

Norman, for our "Journey to Justice" it's important for you to know that we are not out to hurt News Corp., CBS Corp., Lionsgate or Intelsat in any way. It's actually the opposite! We are going to want Rupert Murdoch, Lachlan, James, and Chase Carey to team up with us!

We are also going to need Michael Anthony Nalepa, Leslie Moonves, Jon Feltheimer and Intelsat's David McGlade to take our hand and to join us in making important change happen.

One additional team captain that is a must have is: David Geffen.

Warmly,

Tricia Daniels

cell: 310-614-3408

email: triciadaniels2@gmail.com

----- Forwarded message -----

From: **tricia Daniels** <triciadaniels2@gmail.com>  
Date: Wed, Oct 22, 2014 at 4:22 AM  
Subject: News Corp, (Tricia Daniels)  
To: nsiegel@stellp.com

# 297

Hello Mr. Siegel:

Thank you for your telephone call seeking information.

Last night, immediately upon receiving your message I started

typing and I just finished an information document for your review.  
(See PDF attachment)

I thank you greatly for your review of my situation. I am available  
to talk on the telephone or to meet in person at your office when your  
schedule allows.

Warmly,  
Tricia Daniels  
cell: 310-614-3408  
email: triciadaniels2@gmail.com

 **News Corp. (Per Your Request).pdf**  
186K

#298

**EXHIBIT # 2**

**MY TWO POST- EMPLOYMENT  
WORKER'S COMPENSATION CLAIMS....WHICH THE  
LIONSGATE HUMAN RESOURCES DEPARTMENT  
PROCESSED RAPIDLY.**

From: Tricia Daniels

Telephone: 310-614-3408

Email: triciadaniels2@gmail.com

#299



State of California  
Department of Industrial Relations  
DIVISION OF WORKERS' COMPENSATION



Estado de California  
Departamento de Relaciones Industriales  
DIVISION DE COMPENSACIÓN AL TRABAJADOR

**WORKERS' COMPENSATION CLAIM FORM (DWC 1)**

**PETITION DEL EMPLEADO PARA DE COMPENSACIÓN DEL TRABAJADOR (DWC 1)**

**Employee:** Complete the "Employee" section and give the form to your employer. Keep a copy and mark it "Employee's Temporary Receipt" until you receive the signed and dated copy from your employer. You may call the Division of Workers' Compensation and hear recorded information at (800) 736-7401. An explanation of workers' compensation benefits is included as the cover sheet of this form.

You should also have received a pamphlet from your employer describing workers' compensation benefits and the procedures to obtain them.

**Empleado:** Complete la sección "Empleado" y entregue la forma a su empleador. Quédese con la copia designada "Recibo Temporal del Empleado" hasta que Ud. reciba la copia firmada y fechada de su empleador. Ud. puede llamar a la Division de Compensación al Trabajador al (800) 736-7401 para oír información grabada. En la hoja cubierta de esta forma esta la explicación de los beneficios de compensación al trabajador.

Ud. también debería haber recibido de su empleador un folleto describiendo los beneficios de compensación al trabajador lesionado y los procedimientos para obtenerlos.

Any person who makes or causes to be made any knowingly false or fraudulent material statement or material representation for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a felony.

Toda aquella persona que a propósito haga o cause que se produzca cualquier declaración o representación material falsa o fraudulenta con el fin de obtener o negar beneficios o pagos de compensación a trabajadores lesionados es culpable de un crimen mayor "felonia".

**Employee—complete this section and see note above** **Empleado—complete esta sección y note la notación arriba.**

1. Name. *Nombre.* TRICIA DANIELS Today's Date. *Fecha de Hoy.* November 27, 2012
2. Home Address. *Dirección Residencial.* 1015 N. Doheny Drive, Apt 1
3. City. *Ciudad.* West Hollywood State. *Estado.* CA Zip. *Código Postal.* 90069
4. Date of Injury. *Fecha de la lesión (accidente).* Repeated Exposures 2004 to the present Time of Injury. *Hora en que ocurrió.* 24/7m. non-stop p.m.
5. Address and description of where injury happened. *Dirección/lugar dónde ocurrió el accidente.* TV Guide Network, 1800 N. Highland Avenue, LA CA 90028
6. Describe injury and part of body affected. *Describe la lesión y parte del cuerpo afectada.* Repeated Exposures to high level radiation to my brain and body delivered via broadcast Satellite Machinery belonging to my employer
7. Social Security Number. *Número de Seguro Social del Empleado.* 070-56-5311 **\*\* (See Attachment) \*\***
8. Signature of employee. *Firma del empleado.* [Signature]

**Employer—complete this section and see note below.** **Empleador—complete esta sección y note la notación abajo.**

9. Name of employer. *Nombre del empleador.* Lionsgate Entertainment (TV Guide)
10. Address. *Dirección.* 2700 Colorado Ave, Suite 200, Santa Monica, CA 90404
11. Date employer first knew of injury. *Fecha en que el empleador supo por primera vez de la lesión o accidente.* 11/26/12
12. Date claim form was provided to employee. *Fecha en que se le entregó al empleado la petición.* 11/27/12
13. Date employer received claim form. *Fecha en que el empleado devolvió la petición al empleador.* 11/29/12
14. Name and address of insurance carrier or adjusting agency. *Nombre y dirección de la compañía de seguros o agencia administradora de seguros.* The Hartford, PO Box 14187, Lexington, KY 40512
15. Insurance Policy Number. *El número de la póliza de Seguro.* 72 WE ZV4872
16. Signature of employer representative. *Firma del representante del empleador.* [Signature]
17. Title. *Título.* Benefits manager 18. Telephone. *Teléfono.* 310-255-3932

**Employer:** You are required to date this form and provide copies to your insurer or claims administrator and to the employee, dependent or representative who filed the claim within one working day of receipt of the form from the employee.

SIGNING THIS FORM IS NOT AN ADMISSION OF LIABILITY

**Empleador:** Se requiere que Ud. feche esta forma y que provée copias a su compañía de seguros, administrador de reclamos, o dependiente/representante de reclamos y al empleado que hayan presentado esta petición dentro del plazo de un día hábil desde el momento de haber sido recibida la forma del empleado.

EL FIRMAR ESTA FORMA NO SIGNIFICA ADMISION DE RESPONSABILIDAD

☐ Employer copy/Copia del Empleador

☐ Employee copy/Copia del Empleado

☐ Claims Administrator/Administrador de Reclamos

☐ Temporary Receipt/Recibo del Empleado

# 300

State of California  
Department of Industrial Relations  
DIVISION OF WORKERS' COMPENSATION



Estado de California  
Departamento de Relaciones Industriales  
DIVISION DE COMPENSACIÓN AL TRABAJADOR

## WORKERS' COMPENSATION CLAIM FORM (DWC 1)

## PETITION DEL EMPLEADO PARA DE COMPENSACIÓN DEL TRABAJADOR (DWC 1)

**Employee:** Complete the "Employee" section and give the form to your employer. Keep a copy and mark it "Employee's Temporary Receipt" until you receive the signed and dated copy from your employer. You may call the Division of Workers' Compensation and hear recorded information at (800) 736-7401. An explanation of workers' compensation benefits is included as the cover sheet of this form.

You should also have received a pamphlet from your employer describing workers' compensation benefits and the procedures to obtain them.

Any person who makes or causes to be made any knowingly false or fraudulent material statement or material representation for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a felony.

**Empleado:** Complete la sección "Empleado" y entregue la forma a su empleador. Quédese con la copia designada "Recibo Temporal del Empleado" hasta que Ud. reciba la copia firmada y fechada de su empleador. Ud. puede llamar a la Division de Compensación al Trabajador al (800) 736-7401 para oír información gravada. En la hoja cubierta de esta forma esta la explicación de los beneficios de compensación al trabajador.

Ud. también debería haber recibido de su empleador un folleto describiendo los beneficios de compensación al trabajador lesionado y los procedimientos para obtenerlos.

Toda aquella persona que a propósito haga o cause que se produzca cualquier declaración o representación material falsa o fraudulenta con el fin de obtener o negar beneficios o pagos de compensación a trabajadores lesionados es culpable de un crimen mayor "felonia".

Employee—complete this section and see note above      Empleado—complete esta sección y note la notación arriba.

- Name. Nombre. TRICIA DANIELS Today's Date. Fecha de Hoy. 12/17/12
- Home Address. Dirección Residencial. 1015 N. Doheny Drive, #1
- City. Ciudad. West Hollywood State. Estado. CA Zip. Código Postal. 90069
- Date of Injury. Fecha de la lesión (accidente). 12/1/12 thru 12/17/12 Repeated injuries between 12/1/12 thru 12/17/12 Time of Injury. Hora en que ocurrió. All Hours a.m. p.m.
- Address and description of where injury happened. Dirección/lugar donde ocurrió el accidente. wherever I went. Company machinery is still connected to me. High voltage electrical energy directed laser beams delivered by our owned and leased uplink/downlink and satellite broadcast television delivery systems. TV Guide's Employee Interactive Human Games continue.
- Describe injury and part of body affected. Describa la lesión y parte del cuerpo afectada. Burning laser beams are still aimed and are still firing at my most sensitive body parts (brain, heart, eyes and female body parts too.)
- Social Security Number. Número de Seguro Social del Empleado. 070-56-5311
- Signature of employee. Firma del empleado. [Signature]

Employer—complete this section and see note below. Empleador—complete esta sección y note la notación abajo.

- Name of employer. Nombre del empleador. Lionsgate Entertainment (TV Guide)
- Address. Dirección. 2700 Colorado Ave, Suite 200, Santa Monica, CA 90404
- Date employer first knew of injury. Fecha en que el empleador supo por primera vez de la lesión o accidente. 12/18/12
- Date claim form was provided to employee. Fecha en que se le entregó al empleado la petición. 12/18/12 (Already had a blank copy)
- Date employer received claim form. Fecha en que el empleado devolvió la petición al empleador. 12/18/12
- Name and address of insurance carrier or adjusting agency. Nombre y dirección de la compañía de seguros o agencia administradora de seguros. The Hartford, P.O. Box 14187, Lexington, KY 40512
- Insurance Policy Number. El número de la póliza de Seguro. 72 WE ZV4872
- Signature of employer representative. Firma del representante del empleador. [Signature]
- Title. Título. Benefits manager 18. Telephone. Teléfono. 310-255-3932

**Employer:** You are required to date this form and provide copies to your insurer or claims administrator and to the employee, dependent or representative who filed the claim within one working day of receipt of the form from the employee.

SIGNING THIS FORM IS NOT AN ADMISSION OF LIABILITY

**Empleador:** Se requiere que Ud. feche esta forma y que propéa copias a su compañía de seguros, administrador de reclamos, o dependiente/representante de reclamos y al empleado que hayan presentado esta petición dentro del plazo de un día hábil desde el momento de haber sido recibida la forma del empleado.

EL FIRMAR ESTA FORMA NO SIGNIFICA ADMISION DE RESPONSABILIDAD

☐ Employer copy/Copia del Empleador ☐ Employee copy/Copia del Empleado

☐ Claims Administrator/Administrador de Reclamos ☐ Temporary Receipt/Recibo del Empleado

Tuesday, November 27, 2012

To: Eileen Kohler  
Lionsgate  
2700 Colorado Avenue, Suite #200  
Santa Monica, CA 90404

cc: Brett Pugliese

From: Tricia Daniels  
1015 North Doheny Drive, #1  
West Hollywood, CA 90069  
Cell: 310-614-3408

Dear Eileen and Brett:

Thank you to both of you for your assistance.

Attached are the two Worker's Compensation Forms that I have filled out.

In addition, I have typed up a description Statement as well as a Witness List. Please see attachments.

Please let me know what other information I can provide to you.

Again, I thank you for your assistance.

Warmly,

Tricia Daniels

Enclosures:

- 1) Worker's Compensation Claim Form DWC
- 2) Worker's Compensation Loss Form (thehartford.com)
- 3) Statement
- 4) Witness List

# 302



### **Statement for Worker's Compensation from Tricia Daniels**

---

**Summary:** My injury is 100 per cent caused by the combination of a) TV Guide Network machinery, b) TV Guide Network employee-technician negligence and c) TV Guide Network deliberate employee crime.

#### **Details:**

**Caused by Machinery:** My injury, highlighted with a special senses impairment is an organic mental/brain trauma injury and its aftermath that is 100 per cent caused by a combination of broadcast operations machinery and commercial satellite transmission machinery that is owned, operated or leased by TV Guide Network.

Our broadcast operations machinery and microwave transmission frequencies (which our company is only supposed to use to beam/transmit TV Shows to the public) was inappropriately used by co-workers to deliver external forceful impact to my skull and body and was used to deliver harmful electronic and electro-magnetic radiation and pyrotechnics directly to my brain and body tissues at ultra-high spectrum and microwave wattage levels. TV Guide Network could have lost our FCC license as a result of the felonies that this group of co-workers committed.

At times, both the external forceful impact and harmful radiation levels were accelerated deliberately by this group of co-workers whose intent was to severely injure me. The technical architecture of our machinery used even allowed these employees simultaneous webcasting/live web viewing with synchronized encoded captions so that they could monitor their felonies in progress like one would watch a live TV show or sporting event being broadcast on TV.

There are many dates of accelerated forceful impact and accelerated microwave wattage/spectrum activity. One date in particular is August 16, 2010 when I was deliberated electrocuted (at high voltage) non-stop for over 5 hours—between the hours of 1:39am and 6:00am by machinery belonging to TV Guide Network. **Please call employee names on my Witness List for further facts, insight and information about the technical architecture of how our machinery was connected to me and how our machinery caused my injury.**

# 303



**Caused by 'Technician and Operations Employee' Negligence:** My injuries are also 100 per cent caused by the negligence of technical and operations employees of TV Guide Network. These technicians and their broadcast operations supervisors are employees who are in charge of safeguarding, operating/controlling, locking down and password protecting all of TV Guide Network's uplink, downlink machinery and broadcast satellite delivery machinery from unauthorized employee use/tampering with. If TV Guide Network's broadcast operations employee-technicians had properly safeguarded company machines and satellite technology machinery then the felonies that happened to me (including my 5-hour electrocution as well as many repeated mini-electrocutions, laser beam attacks, pyrotechnic attacks beamed down via laser beam/satellite from TV Guide machinery to my brain and body) could have been prevented by TV Guide Network.

**Caused by Employee Crime:** My injuries are also 100 per cent caused by a group of TV Guide Network's Hollywood office based employees (my co-workers) who engaged in a crime-wave of 'pre-meditated workplace felonies.' Sadly, one TV Guide Network employee named Julianne Rolle, also a victim of employee crime didn't make it through and died on July 4, 2010.

**More About My Current Situation:** My injury has caused life-changing functioning impairments that currently prevent me from performing normal daily functions required of any person, working or non-working.

My injury has totally changed my cognitive abilities, has caused acute sensory disorientation trauma to my brain and body, and presently limits me from normal daily activity functioning, limits me from employment functioning, limits me from social functioning, limits my functioning ability to concentrate, limits my functioning ability to drive, even limits my functioning ability to walk half a block down a street.

#304

**The Date When I Realized My Job at TV Guide Network 100 Per Cent Caused My Injuries: November 2012 (Earlier This Month).**

Earlier this month, upon hearing the latest from me about my current state of impairment which continues to get worse without any signs of improvement, some of my TV Guide Network witnesses explained to me that a group of rogue TV Guide Network employees committed 24/7 Privacy Rights Invasion on me from 2004 into 2011 where they illegally used TV Guide Network's broadcast machinery and satellite transmission technology (as their own) 24 hours a day/7 days a week on me.

TV Guide Network's satellite technology/and transmission machinery was connected directly to my brain and body without my permission or knowledge 24/7 without interruption for years (2004-2011). **Please call employee names on my Witness List for further fact. They can also provide detail about the technical architecture of how our machinery caused my injury, how our machinery was connected to me, etc.**

During the year 2010, the Privacy Rights Invasion accelerated and turned into some sort of "Interactive Human Game" on me where Hollywood Office co-workers committed felonies by using TV Guide Network's satellite broadcast operations machinery system, (uplink/downlink, dish antenna, transponders, etc.) to beam harmful electronic and electro-magnetic radioactive materials, pulses, currents, and microwave beams into my brain/body. These currents were intended to cause accelerated serious damage and impairment to my body functions.

**Signed:**

**Date:**

Tricia Daniels

1015 N. Doheny Drive, Apt 1

West Hollywood, CA 90069

Cell: 310-614-3408

#305

**Worker's Compensation Loss –Witness Names and Contact Information Attachment for Tricia Daniels**

**WITNESS LIST**

**Section One:** This group of TV Guide Network co-workers are the best witnesses. They have the most information about my injuries caused 100 per cent by TV Guide Network machinery, employee-technician/machine operator negligence and by employee crime-wave.

- 1) Rick Salomey (Supervising Producer) cell phone #: 323-252-5975
- 2) Laura Slobin (Freelance Producer) cell phone #: 818-802-7529
- 3) David Park (Freelance Producer) cell phone #: 323-708-0372
- 4) Tom McMahon (Producer) cell phone #: 310-383-2948
- 5) Steve Sabellico (Director, Rights & Clearances) cell phone #: 818-231-0006

**Section Two:** This group of TV Guide Network co-workers also have information about the TV Guide Network owned, operated and leased machinery that were used in negligence and in non-compliance with Federal Communications Commission (FCC) and Federal and State Laws on me. (Some members of this group are no longer current employees of TV Guide Network and would have signed Separation-Confidentiality Agreements on file with Lionsgate.)

- 1) Scott Woodward (VP, Programming and Production) cell #: 213-590-0365
- 2) Greg Hughes (Director, Operations) cell phone #: 323-855-2740
- 3) Kristan Giordano (Executive Producer) cell phone #: 213-804-0705
- 4) Tina Charles (Supervising Producer) cell phone #: 323-350-3833
- 5) Amy Sweet (Writer) cell phone #: 818-970-2460
- 6) Anne Alderete (Managing Editor) cell phone #: 323-819-8282
- 7) Matt Singerman (V.P. of Programming) cell phone #: 323-646-0622
- 8) Michael Nalepa (Talent Dept. Assistant.) cell phone #: 323-387-0849
- 9) David Anderson (Marketing Coordinator) cell phone #: 213-700-7112
- 10) Fernita Wynn (Talent Executive) cell phone #: 818-793-8939

# 306

**Worker's Compensation Loss –Witness Names and Contact Information Attachment for Tricia Daniels**

- 11) Jack Carey (Executive Vice President) cell phone #: 661-212-0995
- 12) Lisa Germani (Director, Talent Dept.) cell phone #: 323-578-4114
- 13) Paul Adler (V.P., Current Programming) cell phone #: 323-972-7299
- 14) Carla Hawkes (Producer) cell phone #: 310-745-9206
- 15) Ken McGilvray (Producer) cell phone #: 323-633-6779
- 16) Stephanie Schuler Griffin cell phone #: 310-721-0555

**Section Three:** Another Witness with Knowledge

Lynda P. Noiseux former next-door neighbor to Tricia Daniels at 1015 N.

Doheny Drive. Lynda's new address is: Lynda P. Noiseux, 723 N. Westmount Drive,  
Unit 101, West Hollywood, CA 90069

#307